



Steady Course for Sustainability

GAC Norway Sustainability Report

Executive summary (At a glance)

GAC Norway AS provides ship agency, customs, logistics, and warehousing services across Norway, supporting customers in the maritime industry. This is the company's first sustainability report and covers the reporting year 2025 (1 January–31 December 2025). The report is prepared with reference to the GRI Standards as guidance for transparency and structure but is not prepared in accordance with the GRI Standards.

We approach sustainability through practical improvement in everyday operations, adapting where risk and expectations change, innovating where we can simplify or improve processes, and reducing environmental impact where we have the most influence. Our work is anchored in our management systems (ISO 9001, ISO 14001 and ISO 45001), with clear responsibilities, procedures, training, audits and follow-up of incidents and improvement actions. As this is our first sustainability report, we prioritise transparency about boundaries and data limitations, and we define a clear roadmap to strengthen data quality and coverage over time.

Based on an internal materiality assessment reflecting operational risk exposure and stakeholder expectations, the report identifies key topics including dangerous goods (DG) handling and spill prevention, resource efficiency and waste management, sustainable procurement and supplier governance, transport and travel impacts, occupational health and safety, training and competence, diversity and inclusion, and ethical business conduct and compliance.

In 2025, HSSE performance remained strong, with no fatalities, lost time injuries, medical treatment injuries or first aid cases recorded. The QHSSE reporting system registered 208 total reports in 2025 (150 quality-related and 58 HSSE-related), indicating an active reporting culture and a preventive focus on identifying and addressing issues early. Environmental reporting for 2025 includes one minor spill incident associated with damaged incoming goods containing chemicals; the case resulted in strengthened receiving controls and was used as a learning example in training.

As a first step towards structured climate reporting, the company has also prepared an estimated GHG emissions baseline for 2025 covering Scope 1, 2 and 3 emissions, with a total of 2,077 tCO₂e. Scope 3 upstream transportation and distribution represents the largest share of emissions, reflecting the company's role as a logistics and ship agency service provider.

GAC Norway AS has also been assessed through the EcoVadis sustainability rating programme, receiving a Gold rating in 2024 and a Silver rating in 2025. The 2025 result reflects a transitional period between environmental certifications, during which the company moved from a national scheme (Miljøfyrtårn) to internationally recognized ISO 14001 certification.



As this is the first reporting cycle, quantitative data coverage is still developing. Several environmental indicators are currently limited by shared-site arrangements (e.g., waste and energy data at multi-tenant locations), and business travel figures primarily reflect journeys booked through the company's travel agent. The report therefore combines available quantitative indicators with operationally anchored descriptions of governance, controls and improvement actions.

Looking ahead, GAC Norway AS will continue to develop sustainability work in a pragmatic and stepwise way through established governance routines and its certified management systems. Priorities and initiatives will be defined through the company's normal planning and governance processes. As reporting maturity increases, the company expects to strengthen consistency in operational controls across locations and improve the completeness and quality of selected datasets to support more robust reporting over time.

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1. About this report

This sustainability report presents GAC Norway AS' approach to sustainability, material topics, and selected initiatives and performance indicators for the reporting year 2025. The report is intended for internal and external stakeholders, including employees, customers, suppliers and business partners, and supports reporting linked to initiatives we are engaged in such as the UN Global Compact and EcoVadis.

1.1 Reporting period and scope

The reporting period is 1 January 2025 to 31 December 2025 and covers GAC Norway AS' operations in Norway across ship agency, freight forwarding, logistics, customs services and warehousing. The report addresses sustainability topics where GAC Norway AS has direct operational control (e.g., HSSE management, training, office and warehouse practices, spill prevention and internal governance) as well as topics where the company has influence through its role in the value chain (e.g., transport solutions arranged through external carriers and sustainability expectations towards suppliers). Where value chain topics are covered, the report describes GAC Norway AS' approach to requirements, governance and follow-up rather than the operational performance of suppliers.

1.2 GRI reference

This report is prepared with reference to the GRI Standards as guidance for transparency and structure. The report is not prepared in accordance with the GRI Standards. A content overview is provided in the Appendix showing where key topics are addressed and where information is not yet available.

1.3 CSRD context

This report also supports GAC Norway AS' preparation for increasing expectations related to sustainability reporting, including the EU Corporate Sustainability Reporting Directive (CSRD). While GAC Norway AS is not currently subject to mandatory CSRD reporting, the company considers this report an important step in strengthening sustainability governance, materiality assessment and data structures aligned with evolving regulatory and stakeholder expectations.

The report also responds to increasing expectations from customers, business partners and other stakeholders who require transparency around sustainability performance as part of their own reporting and procurement processes.

1.4 First reporting cycle and limitations

As this is the company's first sustainability report, the scope and level of detail will be further developed in future reporting cycles as data availability, processes and stakeholder engagement mature. Where data coverage is limited (for example, site-specific waste quantities at locations with shared waste solutions or travel booked outside the travel agent), this is described in the reporting notes together with planned improvements in data quality and completeness.

2. About the Company

2.1 Company overview

GAC Norway AS is a private limited company established in 1835 and part of the global GAC Group. The company is wholly owned by GAC Netherlands B.V. and ultimately part of Gulf Agency Company Limited. GAC Norway AS operates as part of a global maritime and logistics network while maintaining a strong local presence along the Norwegian coast.

2.2 Operations and services

GAC Norway AS is a comprehensive maritime services company providing ship agency, logistics, and related support services. The company serves customers primarily in the maritime and energy markets, including the offshore, tanker, LCO2, cruise, dry cargo, P&I and naval/defence segments. Core services include ship agency and husbandry services, Shorex, as well as freight forwarding and time-critical ship spares transport coordination by sea, air, and road. Additional services include courier solutions, charters and hand-carry services, customs clearance, bonded warehousing, and general logistics and warehouse operations.

The company operates offices and warehouses at multiple locations across Norway, including sites in ports, harbours and terminals. Certain activities are subject to regulatory requirements, including customs-related services, bonded warehousing, and the handling and coordination of dangerous goods. On the ship agency side, regulatory activities include vessel reporting, clearance requirements, and immigration and crew-related services. These activities are managed through established procedures, competence and training programs, and compliance controls.

Value chain position: GAC Norway AS sits between customers and a network of suppliers and service providers, combining direct operational activities (ship agency, warehousing) with coordination of outsourced transport and services. Sustainability impacts are addressed through management systems, procurement requirements and supplier governance.

2.3 Locations and markets

GAC Norway AS cooperates closely with agent partners across the global GAC Group network and with service providers internationally to support customers' logistics and shipping activities. At the same time, GAC Norway AS' operational footprint is based in Norway, providing nationwide coverage through offices from Tønsberg and Stavanger in the south, along the west coast including Bømlo, Bergen, Mongstad and Ålesund, and further north to Kristiansund, Tromsø and Hammerfest.

The company's main office is located in Bergen. Main warehouse operations, which also function as hubs for consolidation and freight forwarding activities, are located in Bergen and Stavanger. In addition, GAC Norway AS operates its own storage facilities in Hammerfest, Kristiansund and Mongstad. This geographic presence enables the company to support customers along the full length of the Norwegian coastline, including key maritime and energy locations.



2.4 Customers

The company primarily serves customers operating in the maritime and energy/offshore value chains, supported by international logistics flows through Norwegian ports. The customer base includes ship owners and operators, charterers, ship management companies, tanker and dry cargo operators, cruise lines, and companies supporting offshore and marine operations. The company also supports naval/defence-related port calls and logistics where applicable.

A significant portion of customers are oil and gas companies, offshore service providers, and engineering, procurement and construction firms supporting offshore development, operations and maintenance of oil and gas fields, including repair and modification activities. The company also provides logistics and freight forwarding services to manufacturers, distributors, and customers requiring project logistics, ship spares handling, and bonded storage solutions.

In addition, GAC Norway AS supports customers with customs brokerage and regulatory compliance needs, as well as maritime service providers such as surveyors, marine equipment suppliers, and specialist contractors operating in port and offshore environments.

Customers expect reliable, time-critical service delivery with high HSSE standards, strong compliance (including customs, dangerous goods and sanctions-related requirements), and consistent service quality across locations. Sustainability expectations increasingly include responsible procurement, supplier follow-up, and documentation that supports customers' own reporting needs.

2.5 Employees

At the end of the reporting period, GAC Norway AS employed 83 permanent employees and 2 temporary staff. In addition, the company used several on-call substitutes during the year. The workforce includes office-based roles (shipping agency, freight forwarding, finance and support functions) and operational roles in warehouses and port-related activities. In several functions, employees alternate between desk-based coordination and on-site operational tasks.

To support vessel calls and other time-critical operations, parts of the organisation operate on a 24/7 basis, including shift work and on-call duty arrangements. Health, safety, and competence are therefore key focus areas within the company's management systems.

Employee involvement is ensured through appointed safety representatives and a Working Environment Committee (AMU). Through the AMU, employee and employer representatives jointly follow up HSE and working environment priorities, risk areas, and improvement actions.

Table 2-1: Workforce snapshot (end of 2025)

Indicator	2025
Total permanent employees	83
Total temporary employees	2
Office-based roles (primarily)	78
Operational roles (primarily warehouse/port)	7

3. Governance, Ethics and Compliance

3.1 Code of Ethics and business conduct

GAC Norway AS operates in accordance with the GAC Group Code of Ethics, which sets out the Group's commitment to integrity, ethical business conduct and compliance with applicable laws and regulations. The Code defines standards of behaviour expected from employees and relevant third parties and supports consistent decision-making across the organisation.

The Code applies to employees and to third parties acting on behalf of the company, including suppliers, subcontractors, consultants and other business partners. Compliance with the Code is a condition for working for or representing GAC, and breaches may result in corrective actions in line with applicable rules and procedures.

3.2 Ethical principles and human rights

GAC Norway AS is committed to conducting business in a manner that respects human rights and labour standards. The company does not tolerate forced labour, human trafficking or child labour, and supports equal treatment and non-discrimination in the workplace. A safe, respectful and secure working environment is a fundamental expectation for employees and for third parties performing work on behalf of the company.

3.3 Customers, suppliers and fair competition

GAC Norway AS is committed to fair competition and compliance with applicable competition and anti-trust laws. Customers can expect professional conduct, honest communication and consistent service quality supported by clear procedures and accountable follow-up. The company

also sets expectations for suppliers and partners to operate in line with ethical and legal requirements.

3.4 Anti-corruption, compliance and whistleblowing

Integrity and legal compliance are fundamental principles within the GAC Group and GAC Norway AS. The compliance framework includes requirements related to gifts and hospitality, conflicts of interest, and prevention of bribery, money laundering and sanctions breaches. Due diligence on relevant third parties forms part of this approach.

Employees and business partners are encouraged to speak up and report concerns through established whistleblowing channels, which are available to both internal and external parties. Reported concerns are handled in a structured and confidential manner, with a clear expectation of non-retaliation.

In 2025, no whistleblowing reports or formal grievance cases were registered. The company nevertheless emphasises the importance of maintaining accessible speak-up mechanisms and encourages employees and business partners to raise concerns where relevant, as part of a transparent and responsible governance culture.

3.5 Governance culture and values

The Code of Ethics is derived from the Group's operating values and "GAC Spirit," emphasizing loyalty, service quality, valuing people, long-term relationships, honesty and compliance. These values guide behaviour and support long-term trust with customers, employees and business partners.

3.6 Local implementation of the Code of Conduct

Group requirements are implemented locally through a dedicated Code of Conduct procedure that defines expected standards of behaviour for employees and leaders. The procedure provides guidance on professional conduct, workplace behaviour, confidentiality, customer and supplier interactions, and compliance with laws and internal policies.

3.7 Workplace conduct, equality and safety

GAC Norway AS aims to maintain a safe, respectful and inclusive working environment. The Code of Conduct establishes zero tolerance for harassment, discrimination, violence, the possession or use of weapons, and the use of alcohol or drugs in the workplace. Employees are expected to treat

colleagues and stakeholders with professionalism and respect, including during representation activities.

3.8 Compliance, reporting and training

Employees are required to complete mandatory training through the GAC Academy, including courses related to ethics, compliance and HSSE, as well as other mandatory training relevant to risk and compliance (e.g., data protection and cyber security). These courses include annual refresher requirements to ensure consistent and up-to-date understanding across roles and locations.

3.9 Accountability and enforcement

Responsibilities for ethical conduct and compliance are defined for both leaders and employees. Serious or repeated breaches may lead to disciplinary measures applied in a fair and structured manner in accordance with Norwegian labour legislation and internal procedures.

The company's governance framework is supported by certified management systems and structured assurance activities, described in Chapter 9, and by sustainability priorities and material topics described in Chapter 4.

3.10 UN Global Compact commitment

GAC Norway AS is a participant in the UN Global Compact and supports its Ten Principles on human rights, labour, environment and anti-corruption. This Sustainability Report explains how these principles are translated into governance, management systems and operational practices across our own activities and our value chain influence (see Appendix – UN Global Compact mapping). The report can also support the company's annual UN Global Compact Communication on Progress submission.

4. Sustainability approach and material topics

4.1 Sustainability approach

Sustainability at GAC Norway AS is integrated into the company's strategy and daily operations. As a provider of ship agency, logistics and related support services, the company recognises both its direct environmental and social impacts and its ability to influence sustainability outcomes through procurement practices, logistics solutions and collaboration across the value chain.

Sustainability work is guided by established policies, certified management systems and a strong focus on compliance, risk management and continual improvement. Over time, the company's approach has matured through the transition from national environmental certification to internationally recognised ISO management system standards. Sustainability considerations are embedded in decision-making processes and supported by employee involvement, training and structured follow-up.

4.2 Stakeholders and expectations considered

In identifying material topics, GAC Norway AS considered expectations and risk exposure across key stakeholder groups relevant to the company's activities and operating context. Input from stakeholders is reflected both in the selection of material topics and in the company's environmental aspect work (HSSE-0008), where legal requirements and interested-party considerations are part of the basis for identifying significant environmental aspects.

Stakeholders considered include:

- Employees – safe working conditions, wellbeing, competence development, and effective working environment governance
- Customers – reliable and compliant services, HSSE performance, transparency, and sustainability-related documentation
- Suppliers and subcontractors – clear requirements, responsible procurement practices, and effective cooperation on compliance and HSSE matters
- Business partners and agent partners – consistent operational standards, compliance, and reliable cooperation across the network
- Authorities and regulators – compliance with customs, labour, HSSE, and environmental requirements
- Ports, terminal operators and port authorities – safe and efficient port and warehouse operations, ISPS compliance, and emergency preparedness
- Local communities – environmental prevention, safe operations, and minimisation of local impacts
- Future generations – long-term environmental impacts, responsible resource use, and social impacts of the company's activities
- Owners / shareholders – sound governance, risk management, and sustainable long-term business performance
- The GAC Group – alignment with Group policies, governance expectations, and shared reporting frameworks

Stakeholder expectations are reflected in the company's focus on safe and compliant operations, responsible procurement and supplier governance, and increasing demand for sustainability-related documentation that supports customers' own reporting needs.

4.3 Identification and prioritisation of material topics

GAC Norway AS identified material sustainability topics through an internal assessment based on the company's activities, risk profile and stakeholder expectations. Inputs included management and employee workshops, HSSE risk assessments, QHSSE reporting trends, internal and external audit findings, legal compliance registers and established management system processes aligned with ISO 9001, ISO 14001 and ISO 45001.

Topics were prioritised based on:

- Potential impact severity – people, environment, compliance, reputation, business continuity
- Likelihood and operational exposure in day-to-day activities
- Stakeholder concern and expectations
- Degree of control or influence – own operations vs value chain

As this is the company's first sustainability report, the materiality assessment is primarily based on internal expertise and available data. The approach will be further developed in future reporting cycles, including broader stakeholder engagement and continued strengthening of data quality, scope, and traceability.

4.4 Material topics – results and boundaries

The table below summarises the material topics identified for GAC Norway AS, including whether the topic relates primarily to direct operational control or value chain influence, and how the topic is managed and monitored.

Table 4-1: Material topics, boundaries and management approach (2025)

Material topic	Why material	Boundary	How it is managed	KPIs / indicators
Dangerous goods (DG) / spill prevention	Handling of dangerous goods in port and warehouse environments carries a real risk of leakage or spill with potential consequences for the marine and local environment, regulatory compliance and company reputation.	Mainly control	<ul style="list-style-type: none"> ISO 14001 / 45001 / 9001 management system controls Warehouse and DG procedures, segregation and receiving inspections Spill kits at all locations; competence and case-based learning Follow-up via safety rounds, internal audits and QHSSE reporting 	<ul style="list-style-type: none"> Environmental incidents: 1 (2025) Spill kits verified at all locations (2025) Spill response procedure (planned) Spill drills / exercises (planned)
Resource efficiency, circular economy, packaging & waste	Material consumption, packaging and waste generation create environmental impacts and regulatory obligations, and represent a practical opportunity to improve resource use over time.	Mixed (control and influence)	<ul style="list-style-type: none"> Sustainable purchasing routine (needs assessment; reuse/repair preference) Waste sorting routines across locations Packaging reuse where feasible in warehouse and consolidation activities IT equipment takeback programme (Dustin Norway) Follow-up via internal audits and safety rounds 	<ul style="list-style-type: none"> Total waste generated, Bergen main office: 2,027 kg (2025) Waste sorted across 6 fractions (2025) Fractions sorted for recycling or recovery: 34% of total waste (2025) IT takeback climate benefit: 848.5 kg CO₂e (2025)

Transport and travel impacts	Freight transport, business travel and company vehicles contribute to climate-related emissions. GAC Norway AS can influence outcomes through planning, consolidation and carrier dialogue.	Mixed (control and influence)	<ul style="list-style-type: none"> • Travel policy (digital alternatives first; responsible travel choices) • Consolidation and routing dialogue where feasible • Carrier selection dialogue where feasible • GHG baseline prepared for 2025; data coverage to be strengthened over time 	<ul style="list-style-type: none"> • EV share of company fleet: 55% (2025) • Diesel vehicle CO₂e: 5,660 kg / 31,467 km (2025) • Air travel: 180,000 kg CO₂e / 561,000 km (2025) • Train travel: 11.0 kg CO₂e / 5,600 km (2025) • GHG baseline Scope 1, 2 and 3: 2,077 tCO₂e (2025)
Occupational health, safety & wellbeing	Time-critical and 24/7 operations, physical warehouse/port activities and shift work create meaningful health and safety risk requiring strong preventive culture and consistent controls.	Mainly control	<ul style="list-style-type: none"> • ISO 45001 management system, risk assessments and safe work practices • Safety rounds, safety representatives and AMU involvement • QHSSE reporting, audits and management review • Wellbeing measures (health insurance, digital health, exercise reimbursement, yoga) 	<ul style="list-style-type: none"> • HSSE reports: 58 (2025) • Fatalities: 0 / LTI: 0 / MTI: 0 / First Aid: 0 (2025) • Near misses: 3 / Unsafe conditions: 26 (2025) • Participants in Lifestyle change programme: 31 (2025) • Sickness absence: 2.0% (down from 3.5% in 2024) • Safety representatives at all locations: 11 of 11 (2025)

Training & competence	<p>Safe, compliant and reliable operations depend on employees having the right competence for regulated and high-risk tasks including customs, DG handling and HSSE activities.</p>	<p>Mainly control</p>	<ul style="list-style-type: none"> • Mandatory training and refreshers through GAC Academy • Role-based competence requirements for regulated tasks • Local workshops, case-based learning and external seminars • Competence follow-up via audits and QHSSE trends 	<ul style="list-style-type: none"> • Local training sessions and workshops delivered 2025 • Mandatory completion rate for assigned compliance, GDPR and cyber security training: 98.9% (2025) • Competence gaps identified through audits and follow-up 2025 • Internal courses developed in GAC Academy: 2 (2025)
Diversity, equality & inclusion	<p>A diverse and inclusive workforce supports stronger decision-making and organisational resilience. Equal treatment and non-discrimination are also legal obligations under Norwegian labour law.</p>	<p>Mainly control</p>	<ul style="list-style-type: none"> • Code of Conduct with zero tolerance for harassment and discrimination • Competence-based recruitment and structured salary/promotion practices • Speak-up channels and grievance handling • Monitoring via governance routines and engagement feedback 	<ul style="list-style-type: none"> • Workforce: 38% women / 62% men; 19 nationalities 2025 • Gender balance in leadership/management roles: 36% strategic level / 18% Operational Management / 43% Operational level (2025) • DEI-related cases via HR / whistleblowing / QHSSE: 0 (2025)

Sustainable procurement & supplier governance	A significant share of environmental, social and ethical impacts arise through suppliers and outsourced services. Growing due diligence expectations make this an increasingly important focus area.	Mainly influence	<ul style="list-style-type: none"> • Supplier qualification, onboarding and Framework agreements. • Due diligence and assessments where relevant, supported by Factlines (implementation ongoing) • Operational performance follow-up via QHSSE reporting and dialogue • Risk-based supplier audits prioritised by significance and performance/QHSSE history 	<ul style="list-style-type: none"> • Supplier-related QHSSE cases: 22 service failures registered (2025) • Annual supply chain due diligence statement published in accordance with the Transparency Act (2025) • % key suppliers mapped, assessed and meeting defined minimum expectations (planned) • No. of risk-based supplier audits completed (planned)
Ethics & anti-corruption (ethical business conduct and compliance)	Operations across multiple jurisdictions and third-party relationships create exposure to integrity risks including bribery, conflicts of interest and sanctions breaches.	Mixed (control and influence)	<ul style="list-style-type: none"> • GAC Group Code of Ethics and local Code of Conduct • Whistleblowing channels with non-retaliation expectations • Compliance controls (gifts/hospitality, conflicts of interest, sanctions/AML) • Mandatory training via GAC Academy; due diligence on third parties 	<ul style="list-style-type: none"> • Whistleblowing / speak-up cases: 0 (2025) • Confirmed compliance breaches and corrective actions: 0 (2025) • Compliance training completion rate: 98.9% (2025) • Due diligence coverage for relevant third parties planned

Note: KPIs marked “planned” will be developed stepwise as data structures and reporting routines mature, particularly for value chain topics. KPIs marked “2025” reflect data available for the current reporting period.

4.5 Governance and business conduct material topics

The following governance-related topics have been identified as material:

1. Ethical business conduct and anti-corruption

Ethical business conduct is a material topic due to the company's role within international shipping, logistics and maritime services, where operations involve multiple stakeholders, including national and international regulators, customers, non-governmental organisations (such as the UN Global Compact) and industry bodies (such as the International Maritime Organization), across multiple jurisdictions and regulatory frameworks. GAC Norway AS is committed to conducting its business with integrity, transparency and respect for applicable laws and ethical standards.

This topic is governed through Group and local policies, including the Code of Ethics and compliance-related policies, as well as mandatory training and awareness activities. Maintaining high ethical standards is essential to protecting the company's reputation, ensuring trust with customers and partners, and preventing misconduct such as bribery, corruption or conflicts of interest.

2. Compliance with laws and regulations

Compliance with laws and regulations is a material topic due to the highly regulated nature of the company's activities. GAC Norway AS operates within a complex regulatory environment that includes requirements related to customs, sanctions, dangerous goods, HSSE, labour law, environmental protection and data protection, among others.

Failure to comply with applicable legislation could result in legal, financial and reputational consequences. The company therefore places strong emphasis on structured compliance management, supported by procedures, training, internal controls and audits, to ensure consistent and lawful operations across all business areas.

3. Responsible procurement and supplier governance

Responsible procurement and supplier governance are material topics due to the company's reliance on external suppliers, service providers and partners to deliver its services. While many sustainability and compliance requirements are governed by Norwegian legislation and evolving EU regulatory frameworks, including the Corporate Sustainability Reporting Directive (CSRD), the company recognizes its responsibility to ensure that suppliers operate in line with contractual, legal and ethical expectations.

This includes integrating compliance and governance requirements into procurement processes and supplier agreements and applying due diligence where relevant. Measures implemented to ensure compliance with labour regulations, ethical standards and applicable environmental requirements in

outsourced services form part of the company's broader approach to responsible business conduct, compliance and risk management in the value chain.

4.6 Alignment with the UN Sustainable Development Goals

GAC Norway AS aligns its sustainability efforts with the United Nations Sustainable Development Goals (SDGs) as part of its local company strategy. The Sustainable Company Strategy at GAC Norway was developed through employee and manager workshops and reflects a bottom-up approach to identifying the SDGs and focus areas where the company can contribute most. In GAC Norway AS' operating context, sustainability is not treated as a separate policy; it is integrated into how the company prioritises improvements, manages risk and creates value for customers and other stakeholders.

While recognising the importance of all SDGs, GAC Norway AS focuses its efforts on the goals where it can contribute most through its own operations, working environment and value chain influence, as well as through cooperation with customers, suppliers and partners. The SDGs below reflect both local priorities and alignment with the focus areas identified at Group level.

Priority SDGs at company level:

- SDG 3 – Good Health and Well-Being – Prioritised through preventive HSSE work and a strong focus on occupational health, safety and wellbeing in time-critical operations, including attention to both physical safety and mental wellbeing.
- SDG 5 – Gender Equality – Supported through efforts to promote diversity, equality and inclusion and to ensure that opportunities for development and advancement are based on competence and merit.
- SDG 8 – Decent Work and Economic Growth – Addressed through responsible employment practices, competence development, safe working conditions and strong compliance and governance.
- SDG 17 – Partnerships for the Goals – Reflected through cooperation with customers, suppliers, industry partners and the wider GAC network to support shared learning, continual improvement and more sustainable practices across the value chain.

SDGs aligned with priority areas at Group level:

- SDG 12 – Responsible Consumption and Production – Addressed through resource efficiency, waste handling, packaging practices and responsible procurement.
- SDG 13 – Climate Action – Supported through actions related to transport solutions, business travel, energy use and influence over logistics-related environmental impacts, including efforts to promote more efficient logistics solutions where feasible.

- SDG 14 – Life Below Water – Relevant due to the company’s connection to maritime and port-related activities and addressed primarily through prevention of environmental incidents and safe handling of chemicals and dangerous goods.

GAC Norway AS is a participant in the UN Global Compact and supports its ten principles relating to human rights, labour standards, environmental responsibility and anti-corruption. The company’s material topics and management approach described in this chapter form the basis for how these commitments are translated into practical actions across operations and the value chain. Progress is followed up through the company’s management systems, reporting culture and the selected indicators presented later in this report.

5. Environmental performance

5.1 Environmental management approach

Environmental performance at GAC Norway AS is managed through the ISO 14001 certified environmental management system. The system applies across relevant operations and locations and provides a framework for identifying environmental aspects, assessing risks and impacts, ensuring legal compliance and driving continual improvement.

Environmental considerations are integrated into daily operations through documented procedures, training, operational controls and management follow-up. Key environmental aspects include waste management, dangerous goods/hazardous goods handling and spill prevention, use of packaging materials, business travel, and transport-related impacts influenced through logistics solutions and supplier choices. Environmental risks are assessed based on likelihood and consequence, with particular focus on preventing incidents that could affect the marine environment or port areas.

Environmental performance is monitored through internal controls, QHSSE reporting, audits and management review. Findings are used to strengthen preventive measures, update procedures and target competence and awareness activities.

5.2 Dangerous goods (DG) and spill prevention

Dangerous goods (DG) handling and coordination, together with spill prevention and response readiness, are important environmental focus areas for GAC Norway AS due to the company’s combination of ship agency services, warehousing and logistics operations in port and terminal environments.

Spill prevention focus

Our approach is prevention first. We strengthen day-to-day controls and response readiness in warehouses and storage locations.

In warehouse and storage operations, environmental risk is primarily linked to handling goods where leakage or spills may occur, including DG where applicable. Preventive controls therefore focus on receiving routines, early detection of damaged goods, correct storage and segregation, competent handling, and clear escalation procedures. Spill prevention and response expectations are incorporated into existing warehouse and DG procedures and are supported by competence activities (including case-based training) and spill kits at relevant locations.

To strengthen consistency in response readiness and documentation, GAC Norway AS plans to consolidate spill response requirements into a dedicated spill response procedure. Spill prevention and response preparedness are followed up through internal audits, safety rounds, QHSSE reporting and management review.

5.3 Resource efficiency, circular economy and packaging and waste management

Resource efficiency and circularity are relevant across both office-based activities and warehouse operations. This includes everyday consumption of materials and products, the use of packaging materials for cargo handling and consolidation, and waste management across locations. The company aims to reduce unnecessary material use through reuse where feasible, select more sustainable alternatives that meet operational needs, and strengthen data coverage over time.

At office locations, resource efficiency relates to day-to-day consumption of materials and products. The company seeks to reduce unnecessary consumption through reuse where possible and by selecting products that are durable, recyclable or designed for refill rather than replacement, supported by the sustainable purchasing routine.

Circular practices are also applied to IT equipment. GAC Norway AS participates in a take-back programme for used IT equipment to support reuse, refurbishment and responsible recycling, and to extend product lifecycles.

At warehouse hubs, resource efficiency is closely linked to packaging materials used for cargo handling and consolidation. While packaging requirements are often driven by customer needs and cargo characteristics, the company seeks opportunities to reduce material use, reuse packaging where feasible and introduce more sustainable alternatives.

Waste management is relevant across both office and warehouse activities. Across office locations, waste consists primarily of ordinary waste streams such as food waste, packaging, paper/cardboard and hygiene-related consumables. Waste sorting is implemented in line with local arrangements and Norwegian requirements. Where waste solutions are shared with building owners or other tenants, company-specific quantities are not available; this is addressed as a reporting limitation in Chapter 11.

5.4 Environmental impact of logistics solutions and transport

GAC Norway AS does not operate its own heavy freight transport fleet. Freight transport for customers is arranged through external carriers across sea, air and road, while the company operates a limited number of vehicles used for ship agency and operational follow-up.

As a freight forwarder and ship agent, GAC Norway AS influences transport-related impacts through consolidation where feasible, practical routing considerations and carrier selection dialogue. In many cases, transport mode and service level are driven by customer requirements, urgency or cargo characteristics; the company's role is therefore primarily to enable efficient solutions and provide relevant documentation where available.

In addition to transport arranged through external carriers, GAC Norway AS operates a limited number of company vehicles used for ship agency and operational follow-up. The company vehicle fleet includes both diesel and electric vehicles. For 2025, structured activity data was available for the diesel vehicles. Partial distance data has also been obtained for five of the company's six electric vehicles based on service interval readings, while one vehicle has a service agreement with no odometer data available.

Based on the available diesel vehicle dataset, registered activity totalled 31,467 km, with diesel consumption of 2,191.6 litres and estimated CO₂ emissions of 5,660 kg in 2025. These figures therefore represent a partial baseline for the company vehicle fleet rather than a complete fleet total.

Business travel is also a relevant indirect emission source due to operations across Norway and cooperation within the wider GAC network. The Company Travel Policy requires consideration of digital alternatives before travel is arranged and encourages selection of the most environmentally responsible option that is practical and safe.

5.5 Greenhouse gas emissions (GHG)

As part of strengthening its environmental data and reporting practices, GAC Norway AS has prepared a greenhouse gas (GHG) emissions overview for 2025 using the EcoVadis Carbon Estimator, supplemented

with actual electricity consumption data from Fortum for Bergen Head Office and Mongstad. The overview follows the GHG Protocol framework and covers Scope 1, Scope 2 and relevant Scope 3 categories.

GHG emissions for 2025:

- Scope 1: 5.66 tCO₂e
- Scope 2 (market-based): 4.72 tCO₂e
- Scope 3 (estimated, spend-based method): 2,066.70 tCO₂e

Scope 1 emissions reflect actual fuel consumption from company diesel vehicles, as described in Chapter 5.4. Scope 2 emissions are primarily based on measured electricity consumption for Bergen Head Office (90,599 kWh) and Mongstad (36,239 kWh), sourced from Fortum invoices for 2025. For remaining locations, electricity consumption has been estimated using building area and relevant energy intensity benchmarks. An emission factor of 0.026 kg CO₂/kWh for Norwegian electricity (IEA) has been applied, consistent with EcoVadis methodology.

Scope 3 emissions represent the majority of total emissions and are dominated by upstream transportation and distribution (1,172 tCO₂e) and purchased goods and services (748 tCO₂e), reflecting the company's role as a logistics and ship agency service provider where value chain impacts significantly exceed direct operational emissions.

Scope 3 emissions have been estimated using a spend-based approach, where financial data for selected categories has been converted to emissions using standard emission factors. This method provides an initial indication of climate impact but is associated with higher uncertainty compared to activity-based calculations.

The current overview establishes a baseline for further development of emission tracking and improvement measures. GAC Norway AS will continue to improve data completeness and accuracy over time, including prioritising access to actual energy consumption data for additional locations and strengthening visibility of emissions related to transport activities and suppliers. A full breakdown by source is provided in Table 11-7.

5.6 Environmental performance in the supply chain and procurement

GAC Norway AS relies on a broad network of suppliers, service providers and subcontractors. A significant part of the company's environmental impact and ability to influence sustainability therefore lies within the supply chain.

Environmental considerations are integrated into purchasing through the sustainable purchasing routine, including a needs assessment prior to purchase, preference for reuse/repair where feasible and selection of products and solutions that meet operational needs with lower environmental impact. Environmental criteria are applied in supplier selection and follow-up where relevant, including encouraging environmental management systems and responsible handling of packaging and waste.

GAC Norway AS also works to strengthen supplier mapping and sustainability documentation through structured onboarding, contractual requirements and the use of supplier assessments (including Factlines) as part of due diligence and ongoing supplier governance.

5.7 Environmental incidents, monitoring and continual improvement

GAC Norway AS recognises that environmental incidents can occur even with preventive measures in place, particularly in connection with logistics and warehouse operations. The company therefore emphasises reporting, learning and continual improvement. Environmental incidents and relevant deviations are captured through the company's QHSSE reporting system. The system supports structured follow-up, root cause assessment where relevant and implementation of corrective and preventive measures.

During the reporting year, three cases were recorded involving incoming goods containing chemicals that were already damaged upon delivery. In all three cases, GAC Norway AS was not responsible for the upstream transport. Two cases were detected and contained during receiving and handling, and no release to the environment occurred.

In one case, leakage reached a paved outdoor area before it was detected, resulting in a minor spill and therefore being registered as an environmental incident in the QHSSE system. The incident was reviewed and resulted in updates to receiving routines, including strengthened focus on early inspection of incoming goods and awareness of potential transport damage. The case was also used as a learning example in training activities to reinforce spill prevention and proactive controls. Accordingly, one environmental incident is reported for 2025 (Table 8-2).

Environmental follow-up is integrated into internal audits, safety rounds and management review. Relevant locations are equipped with spill kits to support rapid response, and practical preparedness is strengthened through procedure requirements and competence activities.

6. Social performance

6.1 Occupational health, safety and wellbeing

Occupational health, safety and wellbeing are central priorities for GAC Norway AS due to the nature of its operations within shipping, logistics, warehousing and ship agency services. Parts of the organisation operate on a 24/7 basis to support time-critical activities, which can involve shift work, on-call duties, operational pressure and coordination across time zones.

HSSE ambition – No harm

Our ambition is no harm to people, the environment or assets. We pursue this through everyday risk awareness, competent operations and a strong reporting culture, with a focus on prevention, learning and continual improvement.

To support this ambition, health and safety are managed through the company's ISO 45001 certified occupational health and safety management system, supported by HSSE procedures, risk assessments, incident reporting and follow-up, safety rounds, and active involvement of safety representatives.

In 2025, no fatalities, lost time injuries, medical treatment injuries or first aid cases were recorded. HSSE reporting included one environmental incident, three near miss incidents and 26 unsafe conditions, alongside other HSSE-related reports such as observations and improvement actions captured in the QHSSE system. These reports demonstrate an active preventive culture where potential risks are identified and addressed before incidents occur. (A consolidated overview of QHSSE reporting statistics is presented in Chapter 8.)

In 2025, sickness absence was 2%, a significant reduction from 3.5% in 2024.

Employee wellbeing is also monitored through the annual Employee Engagement Survey, which provides insight into wellbeing, engagement and leadership support. The results are used as input for continual improvement at both Group and company level. In addition, GAC Norway AS supports employee health and wellbeing through measures such as private health insurance, access to digital health services, vaccination coverage and reimbursement of exercise expenses. Employees have also been offered a 16-week lifestyle programme and regular yoga sessions during work hours.

6.2 Training and competence development

Competence development is essential for safe, compliant and high-quality operations in GAC Norway AS. The company operates in a regulated and time-critical environment where correct handling of customs requirements, dangerous goods, HSSE requirements, compliance matters and customer coordination is critical to operational reliability.

Employees have access to training through GAC Academy, including mandatory onboarding and refresher training. Mandatory training includes Compliance and Ethics, HSSE Awareness and Cyber Security Awareness, with annual refresher requirements. Employees also complete training in GDPR and data protection to support the correct handling of personal data.

In addition to the Group training framework, GAC Norway AS conducts regular workshops and places strong emphasis on practical, locally driven competence development based on operational experience and real cases. During the reporting year, the company conducted workshops and local training activities, including first aid training, participation in external customs and compliance seminars, and specialised dangerous goods training delivered by accredited providers. The company also developed internal courses in GAC Academy related to warehouse operations and dangerous goods management, using real case studies and reported incidents as learning examples. These courses are digital and available on demand to all relevant staff.

In addition, the company has a policy for the evaluation and approval of external courses and participation in other competence development opportunities that employees may wish to pursue, as well as coverage for Norwegian language courses.

6.3 Diversity, equality and inclusion

Diversity, equality and inclusion (DEI) are important elements of GAC Norway AS' organisational culture and a long-term sustainability goal for the company. As a knowledge-based service provider, the company recognises that a diverse workforce supports broader perspectives, stronger problem-solving and more resilient operations.

GAC Norway AS is committed to providing an inclusive working environment where employees are treated with respect and where opportunities for development and advancement are based on competence and merit. These principles are embedded in the company's Code of Conduct, which establishes zero tolerance for discrimination, harassment or unequal treatment. The company operates within the framework of Norwegian labour legislation, which provides strong protections for employee rights, equality and fair working conditions.

GAC Norway AS works to promote inclusion and equal opportunity through practical HR measures. Recruitment practices are designed to support diversity and inclusion in practice to achieve gender balance and equal opportunity regardless of ethnicity or background. This includes using competence-based criteria and structured selection processes to support fair assessment of candidates. The company also applies structured salary and promotion practices intended to ensure equal treatment and reduce the impact of individual negotiation differences, focusing instead on role level, competence, responsibilities and

performance. These measures support a workplace culture where opportunities for development and advancement are based on merit and fair processes. In 2025, the share of women at strategic level increased to 36%, up from 13% in 2024, reflecting the company's continued focus on promoting women into leadership roles.

Table 6-1: Workforce profile and DEI baseline (2025)

Metric		Result
Workforce		
Employees (headcount)		85
Sickness absence		
– 2025		2.0 %
– 2024		3.5 %
Employment type		
– Permanent		97.6 %
– Temporary / fixed-term		2.4 %
Gender distribution		WomenMen
– Overall		38 %62 %
– Strategic Level		36 %64 %
– Operational Management level		18 %82 %
– Operational Level		43 %57 %
Average Age		
– Women		36
– Men		40
Nationalities		
– Nationalities represented (count)		19

6.4 Working environment, employee voice and responsible working conditions

Employee involvement and a well-functioning work environment are essential in time-critical operations and across multiple locations. GAC Norway AS therefore uses structured routines to support employee voice, identify working environment risks early, and ensure systematic follow-up of improvements.

Responsible employment practices and fair working conditions are supported through Norwegian labour legislation, formal employment contracts and internal procedures governing working hours, absence management, workplace behaviour, and health and safety responsibilities.

As parts of the organisation operate on a 24/7 basis, attention is given to work schedule planning, rest periods, structured handovers and workload management to support both legal compliance and employee wellbeing. Leaders are expected to monitor workload and operational pressure as part of their management responsibility.

Employee voice and involvement are supported through appointed safety representatives (Verneombud) across all locations and a Working Environment Committee (AMU), providing structured employee participation and joint follow-up of working environment priorities, risks and improvement actions. An overview of these involvement structures is provided in Table 6-2.

Table 6-2: Employee involvement and working environment governance (2025)

Indicator	2025
Locations with appointed safety representative(s) (Verneombud)	11 of 11
Total safety representatives (Verneombud)	11
AMU established	Yes
AMU members (total)	6
AMU composition (employer / employee reps)	3 / 3

Safety rounds are conducted using structured checklists, with findings documented and followed up through assigned actions. Employees also report observations, improvement suggestions, near misses and unsafe conditions through the QHSSE system, supporting early identification and resolution of risks and working environment issues.

Structured feedback loops are used to strengthen the working environment and identify improvement opportunities. Employee input is gathered through the Employee Engagement Survey (EES), annual performance and development dialogues and day-to-day reporting channels. In addition, regular staff meetings are used to support transparency and predictability in the working environment. Management

shares updates on company status, relevant organisational changes and operational situations that may affect employees, and provides an opportunity for questions, dialogue and clarification. Key messages and follow-up items are communicated through normal internal channels and integrated into relevant governance routines where applicable.

Key themes are reviewed by management and relevant teams, translated into actions with owners and deadlines, and followed up through normal governance routines (meetings, audits and management review) to support learning and continual improvement. Where appropriate, improvements and outcomes are communicated back to employees to help close the feedback loop.

The company also has procedures for handling grievances and working environment concerns and encourages open dialogue through leaders and established channels.

7. Responsible procurement and supplier governance

7.1 Responsible procurement and supplier governance

GAC Norway AS recognises that many environmental, social and ethical impacts linked to its services arise in the supply chain through suppliers, subcontractors and service providers. Responsible procurement and clear governance of suppliers are therefore central elements of the company's sustainability approach.

GAC Norway AS coordinates services with over 1,200 suppliers on behalf of its customers. A dedicated supplier management role was established at the end of 2024 to further strengthen supplier governance, risk assessments and follow-up practices across the supplier base.

Supplier expectations are anchored through the Company Purchasing Procedure and supporting routines, including the sustainable purchasing routine. Framework agreements include contractual requirements related to compliance with GAC's Code of Ethics and Supplier Code of Conduct, anti-corruption and bribery, whistleblowing, trade sanctions, anti-money laundering requirements and HSSE policies and procedures. A sustainability appendix aligned with selected UN Sustainable Development Goals is included in relevant supplier agreements to support supplier transparency and continual improvement.

GAC Norway AS also integrates expectations related to Norway's Transparency Act (Åpenhetsloven) into its supplier governance. Where the company is covered by the Transparency Act, this includes carrying out risk-based due diligence related to fundamental human rights and decent working conditions in our own operations and business relationships, publishing an annual due diligence statement, and responding to information requests from the public within the statutory deadlines.

In practice, this is implemented through our established procurement and supplier lifecycle. Supplier expectations are anchored contractually (including requirements related to working conditions where relevant) and supported by our onboarding and qualification processes. For suppliers and service types assessed as higher risk or higher relevance, we use structured supplier assessments and due diligence follow-up to identify potential risk areas, prioritise follow-up and document actions. We also use operational monitoring and our QHSSE reporting system to capture supplier-related deviations, observations and improvement opportunities, and to trigger follow-up dialogue and corrective actions where needed.

Information requests related to the Transparency Act can be sent to alysha.pedersen@gac.com and the annual statement is published on www.gac.com/norway

Depending on service type and risk profile, suppliers may also be asked to document or commit to practical improvement actions. Examples may include:

- strengthening HSSE routines and competence requirements for assigned personnel
- documenting relevant environmental compliance and controls (e.g., permits where applicable, waste handling routines, spill prevention measures)
- improving waste sorting, takeback solutions, reuse/repair practices, or reducing packaging where relevant
- transitioning to lower-emission solutions where feasible (e.g., electrification, optimised routing, reduced idling, or alternative fuels where available)
- working towards monitoring and reporting of agreed activity or emissions-related data for relevant suppliers (e.g., fuel consumption, transport activity), as data availability and supplier maturity develop.
- maintaining relevant certifications or structured management practices (e.g., ISO-based systems) where appropriate for the service and risk profile

These examples are illustrative and applied proportionately based on supplier scope and risk.

Supplier governance is strengthened over time based on operational experience, due diligence inputs and changes in regulatory or stakeholder expectations. During the reporting year, an inspection from the Norwegian Labour Inspection Authority highlighted the need to strengthen contractual wording related to working conditions in certain outsourced services. GAC Norway AS responded by updating supplier contract templates and purchasing procedures to require clearer confirmation of compliance with Norwegian labour legislation, including minimum wage requirements where applicable. A specific contractual declaration was introduced for cleaning service providers, including requirements for registration in the official cleaning register (Renholdsregisteret), restrictions on subcontracting and the company's right to request documentation and carry out verification.

To support consistent application across the supplier base, supplier governance is implemented through structured qualification and onboarding, followed by risk-based monitoring and follow-up (Sections 7.2–7.3).

Supplier lifecycle in practice

Supplier governance is applied through three practical steps: (1) onboarding and qualification (7.2), (2) risk-based due diligence where relevant, and (3) operational follow-up and improvement (7.3). Supplier-related incidents, service deviations and HSSE observations are logged in the QHSSE system and used as input to dialogue and corrective actions.

7.2 Supplier qualification and onboarding

GAC Norway AS has structured processes to ensure suppliers are assessed, approved and documented before they are used. Operations initiate supplier registration in the company's systems, and suppliers complete an online registration form covering company details, invoicing information, insurance documentation and confirmation of applicable compliance and HSSE requirements. Supporting documentation may include certifications, company presentations and other evidence of management practices where relevant.

The onboarding process includes a formal approval step by the accounting function before the supplier can be activated for invoice approval and payment. This provides a practical internal control that supports documentation completeness and consistent onboarding.

For suppliers providing services on a more regular basis, GAC Norway AS works to establish Framework Agreements that contractually anchor compliance, HSSE and sustainability expectations and provide the company with the right to request documentation and perform follow-up where necessary. This is an ongoing effort and coverage is being strengthened over time.

7.3 Supplier monitoring, due diligence and follow-up

Supplier performance and compliance are followed up through a combination of risk-based assessments, contractual requirements, operational dialogue and incident reporting. The level of follow-up is adjusted based on service type, risk exposure and operational criticality.

GAC Norway AS has introduced the third-party supplier risk management platform Factlines to support structured supplier assessments and due diligence. Implementation is ongoing, with the platform being developed as a tool for supplier pre-qualification and ongoing evaluation covering areas such as

management systems, environmental practices, HSSE routines, human rights, responsible business conduct, information security and supply chain transparency.

In daily operations, supplier performance is also monitored through operational experience and the QHSSE reporting system. When supplier-related incidents, service failures or HSSE issues occur, these are reported and used as input to follow-up dialogue and improvement actions. Relevant cases are escalated to the supplier management function and other responsible roles where necessary, and outcomes are tracked through normal improvement follow-up.

Through structured onboarding, contractual anchoring, risk-based due diligence and operational follow-up, GAC Norway AS seeks to ensure that suppliers meet expectations for responsible, safe and compliant delivery throughout the value chain.

8. QHSSE reporting, performance and continual improvement

8.1 QHSSE reporting system, follow-up and continual improvement

GAC Norway AS operates a structured QHSSE reporting system used across the organisation to capture quality and HSSE observations, incidents, deviations and improvement suggestions. The system supports trend analysis and continual improvement by enabling consistent categorisation by place of issue, service affected, activity/process and classification.

Reports are reviewed by the system administrator and assigned for follow-up depending on the nature of the case. Follow-up responsibility may sit with the QHSSE Manager, line managers, segment leads or relevant operational roles. Reporters receive notifications when a case is accepted and when it is completed, supporting transparency and feedback.

Learning and improvement actions are integrated into operational forums and governance processes. Relevant cases are reviewed in department meetings and operational groups, and significant trends and corrective actions are included as fixed agenda items in management review as part of the certified management system. Selected cases are also used in targeted training to support learning and awareness where relevant. Supplier-related incidents and service failures are also captured through the QHSSE system and used as input to supplier follow-up and improvement dialogue where relevant.

8.2 Reporting statistics and evidence of reporting culture

Reporting activity has increased significantly over the past four years, demonstrating active employee involvement in identifying risks, service and process issues, and improvement opportunities.

Table 8-1: QHSSE reporting overview (2022–2025)

Year	Quality reports	HSSE reports	Total reports
2022	30	6	36
2023	45	10	55
2024	99	26	125
2025	150	58	208

The increase in reporting is interpreted as a positive indicator of transparency and preventive culture, rather than an increase in incident severity.

The distribution of reports reflects the company's operational risk profile and activity mix:

- 126 reports related to warehouse and logistics activities
- 66 reports related to ship agency operations
- 16 reports related to other activities

Most reports relate to service/process deviations, unsafe conditions and improvement opportunities rather than injuries or major incidents. This supports the company's preventive approach and indicates that employees use the system actively to improve operational control.

HSSE performance overview – 2025

In 2025, no fatalities, lost time injuries, medical treatment injuries, first aid cases or asset damage incidents were recorded. As outcome indicators, one environmental incident, three near miss incidents and 26 unsafe conditions were reported and followed up (Table 8-2).

Table 8-2: HSSE performance (2025)

Indicator	2025
Fatalities	0
Lost Time Injuries (LTI)	0
Medical Treatment Injuries (MTI)	0

First Aid Cases	0
Asset Damage Incidents	0
Risk	1
Environmental Incidents	1
Near Miss Incidents	3
Security Breach	3
Opportunity for improvement	7
Meeting Action Item	17
Unsafe Conditions	26

Note: Asset Damage Incidents cover damage caused during activities under GAC Norway AS' operational control. Damage present on incoming customer goods prior to receipt is handled as a receiving deviation / HSSE prevention case and is not recorded as asset damage attributable to GAC Norway AS.

In addition, 35 cases across the full QHSSE dataset were classified as Opportunity for Improvement (28 Quality-related and 7 HSSE-related), demonstrating active employee contribution to strengthening routines and controls before incidents occur.

In addition to QHSSE reporting, the company's whistleblowing and grievance channels are monitored as part of the governance and ethics framework. No whistleblowing reports or formal grievance cases were reported in 2025. This is noted as a baseline figure, while the company continues to emphasise the importance of maintaining accessible and trusted reporting channels for employees and relevant third parties.

Reporting data is reviewed in operational forums and used to identify improvement needs in procedures, training and operational controls. Where patterns are observed within a location, service or activity, actions are agreed with responsible managers and followed up to closure. At company level, reporting trends and corrective actions are consolidated as input to management review, supporting prioritisation of risk-reducing measures and continual improvement initiatives across quality, working environment and environmental prevention.

8.3 Customer Satisfaction and feedback

GAC Norway AS operates structured customer feedback questionnaires across its ship agency segments, sent to customers following port calls. Separate questionnaires are used for the tanker, offshore, cruise and

dry cargo segments, covering key service dimensions including speed of response, pre-arrival information, assistance during stay and knowledge of customer needs. A logistics services questionnaire is also used to gather feedback from logistics customers on a periodic basis.

In 2025, a total of 415 responses were received across all questionnaire types. Results were consistently strong, with an overall average score of 4.74 out of 5.00 and 98% of ratings at Good or Excellent level. The tanker and offshore segments received the highest response volumes with 184 and 166 responses respectively, both averaging above 4.75 out of 5.00. The cruise segment received 61 responses with an average score of 4.65 out of 5.00; each cruise response covers the full Norwegian voyage rather than individual port calls, reflecting the nature of cruise agency services.

Customer feedback is reviewed and used as input to service improvement and quality follow-up at both local and company level, consistent with the company's focus on continual improvement through its ISO 9001 certified quality management system.

9. Governance, management systems and continual improvement

9.1 Governance structure and management responsibility

GAC Norway AS' governance model is designed to support safe, compliant and reliable delivery across locations and service lines. Overall responsibility for company governance, compliance and management system performance lies with the Managing Director and management team. Operational responsibility is delegated through line management and segment leads, supported by defined roles within QHSSE, HR, finance and relevant support functions.

The QHSSE Manager is responsible for maintaining and developing the integrated management system, supporting assurance activities (e.g., audits, management review follow-up), and ensuring that improvement actions are tracked and implemented. Managers are responsible for implementing controls in daily operations, ensuring competence and compliance within their areas, and following up reported deviations, incidents and improvement actions.

Governance is exercised through structured forums and routines such as operational meetings, risk assessments, internal controls, audits, safety rounds and management review. These mechanisms ensure systematic follow-up of risks and performance and support consistent implementation of improvements across locations and service lines.

Table 9-1: Governance and assurance overview (2025)

Governance / assurance element	Purpose	Frequency (typical)	Primary responsibility	Evidence / output	Report reference
Management responsibility and governance structure	Clear accountability for safe, compliant and reliable delivery across locations and service lines	Ongoing	Managing Director Management Team	Roles and responsibilities, decisions and follow-up actions	9.1
Management system (ISO 9001 / 14001 / 45001)	Provide a common framework for governance, risk management, legal compliance, competence and continual improvement	Ongoing	Head of People & Process QHSSE Manager	Policies and procedures, documented controls, action tracking	9.2
QHSSE reporting system	Capture deviations, incidents, near misses and improvement suggestions; enable trend analysis, and follow-up	Ongoing	Assigned Line Managers / Operational Segment Leads QHSSE Manager (system admin. / oversight / support)	Case records, classifications, corrective and preventive actions, trend summaries	8.1–8.2
Internal audits	Verify implementation of procedures and controls; identify nonconformities and improvement opportunities	Periodic (per audit programme)	QHSSE Manager	Audit plan, audit reports, findings, actions with owners and deadlines.	9.6
Safety rounds / inspections	Identify working environment risks and verify practical HSSE controls at locations	Offices: minimum annually Warehouses: minimum twice yearly	Local managers and Safety representatives QHSSE Manager (targeted inspections)	Checklists; findings log; closure tracking	9.6 (see also 2.5, 6.4)

Risk assessments (HSSE / operational / environmental)	Identify and evaluate risks, define controls, update measures based on changes and reported cases	Periodic + when changes occur	Line management (risk owners) Safety representative QHSSE support.	Updated risk assessments, control measures, action plans	9.6 (see also 5.1, 6.1)
Management review	Consolidate performance trends, compliance status, audit results, key risks and action follow-up; set priorities for improvement	Periodic (at least annually)	Managing Director Head of People & Process QHSSE Manager	Minutes, decisions, priorities, action list	9.6
Compliance controls and mandatory training	Ensure understanding and implementation of ethics, compliance and HSSE requirements	Ongoing + annual refreshers	Line management Head of People & Process +QHSSE Manager	Training completion records, competence follow-up, escalation where relevant	3.8, 6.2, 9.8
Employee involvement and AMU	Ensure employee voice and joint follow-up of working environment priorities, risks and improvement actions	Ongoing, scheduled meetings.	Employer Representatives Head Safety Representative Employee representatives	Meeting minutes, agreed actions, follow-up status.	2.5, 6.4, 9.9
Supplier governance follow-up	Follow up supplier performance and compliance, use incidents and assessments as inputs to improvement dialogue	Ongoing	Supplier management function Relevant managers QHSSE support	Supplier assessments (where used), follow-up actions, incident records	7.1–7.3, 8.1

9.2 Integrated management system and certifications

GAC Norway AS operates an integrated management system that supports consistent ways of working across quality, environmental management and occupational health and safety. The management system provides a structured framework for governance, risk management, legal compliance, competence and continual improvement.

The system is certified by DNV to the internationally recognised ISO standards:

- ISO 9001 (Quality management)
- ISO 14001 (Environmental management)
- ISO 45001 (Occupational health and safety management)

The ISO certificates cover shipping and logistics services (including bunker trading & brokering) as well as warehousing, distribution and freight forwarding services. Certified locations and site-specific scope are defined in the certificate appendix, including Bergen (head office and warehouse), Stavanger (office and warehouse) and offices in Bømlo, Hammerfest, Kristiansund, Mongstad, Tromsø, Tønsberg and Ålesund. Current certificates are available on request or can be verified directly through DNV's certificate register.

The certifications support structured documentation, consistent operational controls, and a common approach to auditing, corrective actions and management follow-up. This enables the company to manage sustainability-related risks and expectations across locations and service lines and provides assurance to customers and other stakeholders. The integrated management system also provides the backbone for this report's sustainability approach, including material topic governance, performance follow-up and continual improvement.

9.3 Quality management (ISO 9001)

Quality management focuses on reliable service delivery, consistent service processes, customer satisfaction and structured handling of deviations and improvements. In a time-critical and regulated operating context, quality controls are closely linked to operational planning, clear procedures, competence and communication across locations and stakeholders.

Quality-related deviations, service failures and customer feedback are captured and followed up through the QHSSE reporting system (Chapter 8), and learning is used to strengthen procedures, competence and preventive controls. Quality management is also supported through internal audits and management review, ensuring that recurring issues are identified and addressed at the right organisational level.

9.4 Environmental management (ISO 14001)

Environmental management focuses on preventing incidents, ensuring compliance and strengthening practical controls across locations. The environmental management system provides a structured approach for identifying environmental aspects, evaluating risks and impacts, and implementing operational controls. Environmental priorities in GAC Norway AS are linked both to areas under direct operational control (e.g., waste handling, spill prevention, and office and warehouse practices) and to areas where the company primarily has influence through procurement and logistics solutions (see Chapter 5 and Chapter 7). Environmental incidents, near misses and improvement opportunities are managed through internal controls and reporting, with corrective actions and management follow-up used to support learning and continual improvement.

9.5 Occupational health and safety management (ISO 45001)

Occupational health and safety management (ISO 45001) supports systematic prevention of injuries and working environment risks across both office-based and operational roles. The system is particularly important due to 24/7 time-critical operations, physical warehouse/port activities and operational pressure related to vessel calls and logistics.

The ISO 45001 system is supported through HSSE risk assessments, safety rounds, safety representatives and structured follow-up of reported near misses and unsafe conditions (see Chapters 6 and 8). Wellbeing-related inputs are also followed up through engagement feedback and management dialogue.

9.6 Assurance activities: audits, management review and internal controls

Assurance activities provide confidence that procedures and controls are implemented in practice and that improvement needs are identified early. Key assurance elements are summarised in Table 9-1 above, including internal audits, safety rounds, risk assessments, management review and compliance controls, with purpose, frequency, responsibility and output described for each.

Findings from assurance activities are documented and followed up through corrective and preventive actions with assigned owners and closure dates. Input from these activities is also used to prioritise improvements in procedures, training and operational controls.

9.7 An active management system in daily operations

The management system is intended to be practical and operationally anchored. In daily operations, this is reflected through:

- Documented procedures and internal controls for regulated activities (e.g., customs, dangerous goods, bonded warehousing, immigration formalities for crew and vessel reporting), supported by training and follow-up to strengthen consistent implementation
- Competence requirements and mandatory training combined with local, case-based learning
- Use of QHSSE reporting trends to target preventive actions and improve consistency across locations
- Structured follow-up of operational risks through local management and HSSE roles

Going forward, continued work to clarify ownership and strengthen implementation of key procedures across locations will remain an area of focus. The combination of reporting culture (Chapter 8) and assurance activities supports continual improvement by ensuring that lessons translate into new or updated standard operating procedures and controls, and strengthened competence, not only closing individual cases.

9.8 Ethics, compliance and mandatory training

Ethics, compliance and mandatory training are core governance elements and are described in detail in Chapter 3. In the management system context, these elements are followed up through structured training requirements, internal controls and management review to ensure consistent implementation across locations and roles.

9.9 Employee involvement as a driver for continual improvement

Employee involvement is essential to ensuring that the management system remains effective and closely connected to operational reality. Employees contribute through daily dialogue, safety rounds, reporting culture and participation in local improvement activities. Safety representatives and the Working Environment Committee (AMU) provide structured mechanisms for employee voice and joint follow-up of working environment priorities and improvement actions (see also Chapter 2.5 and Chapter 6.4).

Learning from real operational cases is strengthened by using reported incidents and observations as practical examples in local training and awareness activities, particularly in warehousing, dangerous goods handling and HSSE-related topics.

10. Outlook

10.1 Outlook and continual improvement

GAC Norway AS works systematically to strengthen sustainability performance through its certified management systems (ISO 9001, ISO 14001 and ISO 45001), structured governance routines and an active reporting culture. Sustainability work is closely linked to operational realities in ship agency, logistics and warehousing, where risk management, compliance and responsible practices must function in day-to-day delivery.

Looking ahead, the company will continue to develop sustainability work in a structured and pragmatic way through its established governance and planning processes. As internal and external reporting maturity increases, development areas are expected to include strengthening consistency in operational controls across locations, supporting learning and experience sharing, and improving the completeness and quality of selected datasets to enable more robust reporting over time. This also supports the company's preparation for increasing expectations related to EU sustainability reporting regulation, including CSRD-related expectations. This report is not intended as an ESRS-compliant CSRD report but is included to provide transparency and support stakeholders' need for CSRD-relevant sustainability information.

Future improvements are expected to be prioritised and implemented stepwise based on operational risk exposure, stakeholder expectations, capacity and data availability. Through this approach, GAC Norway AS aims to continually strengthen sustainability performance in a way that is practical, measurable and integrated into daily operations—maintaining a strong foundation of compliance and governance while developing more mature sustainability practices over time across environmental, social and value chain topics.

11. Reporting notes, data basis and selected indicators

11.1 Scope, reporting period and boundaries

This sustainability report covers GAC Norway AS and describes key sustainability-related topics linked to the company's activities within ship agency, logistics, freight forwarding, warehousing and supporting office functions in Norway. The reporting period is 1 January 2025 to 31 December 2025. The report addresses both topics where GAC Norway AS has direct operational control (e.g., office activities, warehouse practices, spill prevention, HSSE management, training and internal governance) and topics where the company has influence through its role in the value chain (e.g.,

transport solutions arranged through external carriers, supplier expectations and procurement requirements). Where the report addresses value chain topics, it reflects GAC Norway AS' approach to influence, requirements and follow-up, rather than operational control of suppliers' or carriers' activities.

This report is not prepared as a fully ESRS/CSRD-compliant statement. However, it is structured to provide relevant, transparent and operationally anchored information that supports increasing expectations related to sustainability disclosure and due diligence.

11.2 Basis for reporting and key data sources

The report is based on information and data available through GAC Norway AS' established management systems and internal control processes, including the certified management systems for ISO 9001 (Quality), ISO 14001 (Environment) and ISO 45001 (Occupational Health & Safety).

Key sources include:

- QHSSE reporting data and follow-up documentation (GAC QHSSE system)
- Internal audits, safety rounds and risk assessments
- Management review documentation and governance routines
- Internal procedures and policies (including HSSE, compliance and travel routines)
- Training and competence activities (including mandatory training)
- Supplier onboarding, contractual requirements and supplier follow-up practices
- Group-level inputs where relevant (e.g., Employee Engagement Survey context), applied with consideration to local relevance
- Where quantitative data is included (e.g., QHSSE and HSSE performance indicators), it reflects the company's registered cases and classifications during the reporting period.
- Customer feedback questionnaires (agency segments and logistics), used as input to service quality assessment and continual improvement

11.3 Data approach and limitations

The report combines quantitative indicators and qualitative descriptions. Some sustainability topics are described primarily qualitatively due to current data availability or because impacts occur largely through value chain influence rather than direct operational measurement.

Transport emissions boundary: GAC Norway AS arranges transport of customer cargo through external carriers (sea, road and air freight). Transport mode and service level are typically defined by customer requirements, and the transport is performed by third parties. Precise emissions data is not available to GAC Norway AS, as actual emissions depend on factors such as load consolidation, routing and vehicle type, all of which are under the control of third-party carriers and not always known to GAC Norway AS. Transport-related emissions are therefore estimated using a spend-based approach through the EcoVadis Carbon Estimator and reported as Scope 3:4 (upstream transportation and distribution) in Table 11-7. The figures should be interpreted as indicative estimates. Within this framework, GAC Norway AS seeks to influence outcomes through carrier dialogue, consolidation opportunities where feasible, and offering lower-emission alternatives where practical and aligned with operational and customer needs. GAC Norway AS works towards obtaining increasingly accurate emissions data over time and can support customers with available transport emissions, where requested.

Shared-site data limitation (ports/terminals and landlord-controlled arrangements): Several offices and operational locations are in shared facilities (e.g., port/terminal or multi-tenant buildings) where waste handling and energy/power consumption are managed under shared arrangements. This limits access to reliable, location-specific quantitative data attributable to GAC Norway AS (e.g., waste quantities by fraction and electricity consumption). As a result, these items are not reported as location-level quantitative indicators in this reporting cycle. Waste quantities presented in this report therefore cover Bergen main office only, which is currently the only location where waste is collected and reported under a dedicated agreement (not shared with other tenants). For electricity, actual consumption data is available for Bergen Head Office (90,599 kWh) and Mongstad (36,239 kWh), sourced from Fortum invoices for 2025 and used in the GHG emissions overview in Table 11-7. For remaining locations, electricity consumption is not separately available and has been estimated using building area and energy intensity benchmarks. Although quantitative data is limited at shared sites, GAC Norway AS follows practical measures to support compliance and responsible resource use. This includes ensuring that waste sorting solutions are available and used in daily operations, reinforcing correct waste handling practices through local routines and awareness, and applying everyday energy-saving practices (e.g., switching off lights and equipment when areas are not in use) where the company can influence behaviour within shared premises.

GHG emissions data and methodology: The GHG emissions overview presented in Table 11-7 is based on a combination of measured and estimated data. For locations where actual electricity consumption data is not available, consumption has been estimated based on the floor area of each location, using average energy use figures for comparable office buildings through the EcoVadis Carbon Estimator. Scope 3 categories have been estimated using a spend-based approach, applying standard emission factors to financial data for selected categories. This method provides

an indicative baseline but is associated with higher uncertainty than activity-based calculations. GAC Norway AS will prioritise obtaining actual meter data for additional locations and strengthening activity-based data for key Scope 3 categories in future reporting periods.

Business travel data limitation: Business travel figures are based on journeys booked through the company's travel agent and therefore do not represent a complete record of all travel activity. In particular, local public transport (e.g., local buses and train connections) and taxi journeys are commonly purchased directly by employees and reimbursed through expense claims (for example, transport to/from airports). These reimbursed journeys are not included in the travel statistics presented in this report, as they are not currently captured in a structured way that enables consistent reporting (e.g., routes, distance and associated emissions). GAC Norway AS will therefore prioritise consistent use of the travel agent for travel bookings where this is applicable and feasible, and continue to describe the remaining limitation transparently in future reporting.

Company vehicles data note: For 2025, GAC Norway AS has obtained a structured dataset for the diesel vehicle fleet, including annual kilometres, fuel consumption and estimated CO₂ emissions. Partial distance data has also been obtained for five of six electric vehicles based on service interval readings; figures are approximate as the available data does not align precisely with the 2025 calendar year. One electric vehicle has a service agreement with no odometer data available at this time. The company vehicle figures presented in this report should therefore be interpreted with consideration of these data boundaries. GAC Norway AS aims to strengthen completeness and consistency of vehicle data in future reporting cycles.

Supplier data limitation: Supplier sustainability information is currently available for some suppliers through contractual documentation and due diligence assessments, but coverage is not yet complete across the full supplier base. As a result, supplier-related indicators are described primarily qualitatively in this reporting cycle. Data structures and follow-up will be strengthened as the "key supplier" scope, supplier KPIs and supporting documentation routines mature.

GAC Norway AS will continue to strengthen data quality and consistency over time by improving the structure of sustainability-related metrics where practical and relevant to the company's operations and stakeholder expectations.

11.4 Definitions and abbreviations

Key terms and abbreviations used in this report include:

- **AMU:** Arbeidsmiljøutvalg (Working Environment Committee)
- **CoP:** Communication on Progress

- **CSRD / ESRS:** EU Corporate Sustainability Reporting Directive / European Sustainability Reporting Standards
- **DEI:** Diversity, Equality and Inclusion
- **DG:** Dangerous Goods
- **EcoVadis:** Independent sustainability ratings and assessment platform
- **EES:** Employee Engagement Survey
- **FA:** First Aid Case
- **GCA:** GAC Corporate Academy
- **GDPR:** General Data Protection Regulation
- **GHG:** Greenhouse Gas
- **GRI:** Global Reporting Initiative
- **HSSE:** Health, Safety, Security and Environment
- **ISO 9001 / ISO 14001 / ISO 45001:** Certified management system standards for Quality / Environment / Occupational Health & Safety
- **LTI:** Lost Time Injury
- **MTI:** Medical Treatment Injury
- **QHSSE:** Quality, Health, Safety, Security and Environment
- **SDG:** Sustainable Development Goals
- **UNGC:** UN Global Compact

11.5 Selected quantitative indicators

This chapter summarises selected quantitative indicators used by GAC Norway AS to monitor environmental performance and support continual improvement. The indicators are primarily based on available operational data from waste contractors, electricity invoices, travel reporting, company vehicle data, IT takeback reporting and the EcoVadis Carbon Estimator. Where 2024 figures are shown, they are included to provide context and a baseline for comparison.

11.5.1 Waste

GAC Norway AS works to minimise waste generation and ensure proper sorting and handling of waste streams in line with Norwegian requirements and local waste agreements. Waste data is used as a practical indicator of resource efficiency and environmental orderliness and is followed up through internal audits, safety rounds and management review where relevant.

Data boundary: The waste figures below cover Bergen main office only, as this is the only site where GAC Norway AS has a dedicated waste agreement and can extract company-specific waste data. Other locations use shared waste solutions, and company-specific quantities are not currently available.

Table 11-1: Waste overview (2024–2025)

Year	Total waste (kg)	Collections (no.)
2024	1,915	61
2025	2,027	84

In 2025, total registered waste increased by 112 kg compared to 2024 (+5.8%). The number of collections also increased (from 61 to 84), indicating a higher collection frequency during the year. Year-on-year differences may be influenced by collection arrangements and waste handling routines (e.g., frequency of pickup and bin utilisation) and should therefore be interpreted with caution.

Table 11-2: Waste fractions (kg) – 2024

Waste fraction	kg
Sorted combustible waste (residual)	1,398
Food waste (kitchen/canteen)	330
Mixed glass and metal packaging	77
Mixed paper, cardboard and cartons	70
Brown paper	40
Total	1,915

Table 11-3: Waste fractions (kg) – 2025

Waste fraction	kg
Sorted combustible waste (residual)	1,336
Food waste (kitchen/canteen)	528
Mixed glass and metal packaging	77
Mixed paper, cardboard and cartons	46
Mixed plastics (non-packaging)	15
Mixed soft and hard plastic packaging	25

Total	2,027
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Residual combustible waste remains the largest fraction in both years. The increase in 2025 is mainly driven by higher registered food waste (+198 kg). This may reflect higher on-site presence and activity levels at the Bergen main office in 2025, as well as changes in collection frequency and bin utilisation.

11.5.2 IT equipment takeback (reuse and recycling)

GAC Norway AS subscribes to an IT takeback service with Dustin Norway. Through this agreement, obsolete IT equipment is prioritised for reuse where feasible and otherwise handled through high-quality recycling. This supports resource efficiency by extending product lifecycles and reducing the need for new production.

In 2025, the takeback solution resulted in an estimated climate benefit of 848.5 kg CO₂e, primarily driven by reuse (763.5 kg CO₂e), with a further 85.0 kg CO₂e benefit attributed to recycling. The reported treatment outcomes showed material recovery of 33 kg (72%) and energy recovery of 12 kg (27%), with 0 kg reported to landfill (negligible in weight). The products handled included desktop PCs and HDDs.

Table 11-4: IT equipment takeback overview (Dustin Takeback, 2025)

Indicator	Result (2025)
Estimated climate benefit (total)	848.5 kg CO ₂ e
– of which from reuse	763.5 kg CO ₂ e
– of which from recycling	85.0 kg CO ₂ e
Products handled	Desktop PCs; HDDs
Units recorded (reuse / recycling)	Desktop: 2 / 15; HDD: 0 / 1
Material recovery	33 kg (72%)
Energy recovery	12 kg (27%)
Landfill	0 kg (reported as negligible)

11.5.3 Company vehicles (partial fleet dataset)

GAC Norway AS operates a company vehicle fleet consisting of both diesel and electric vehicles. For 2025, structured reporting data was available for the diesel vehicles. Partial distance data has also been obtained for five of the company's six electric vehicles based on service interval readings; figures are approximate as the available data does not align precisely with the 2025 calendar year. The figures below should therefore be understood as a partial view of company vehicle activity and related emissions.

Table 11-5: Company vehicle activity and emissions

Indicator	Result (2025)
Fleet overview	
Total vehicles in fleet	11
- Diesel vehicles	5
- Electric vehicles	6
Diesel vehicles (structured dataset)	
Vehicles included in dataset	5
Total distance driven	31,467.0 km
Total fuel consumption	2,191.6 l
Average fuel consumption	7.0 l/100 km
Estimated CO ₂ emissions (Scope 1)	5,660 kg CO ₂
Electric vehicles (partial dataset)	
Vehicles included in dataset	5 of 6
Total distance driven (estimated)	~49,072 km
Estimated CO ₂ emissions (Scope 1)	0 kg CO ₂

Note: Diesel vehicle figures are based on structured fleet data. Electric vehicle distance figures are approximate, based on service interval readings for five of six vehicles. One vehicle has a service agreement with no odometer data available. Electric vehicles produce zero direct (Scope 1) CO₂ emissions.

11.5.4 Business travel

Business travel is a relevant indirect emission source for GAC Norway AS due to travel between locations in Norway, customer coordination and cooperation within the wider GAC network. The company seeks to reduce unnecessary travel through planning, consolidation of trips where feasible and conscious travel choices, while recognising that geography, operational requirements and time-critical activities can limit available alternatives.

Table 11-6: Business travel overview (2024–2025)

Year	Flight CO ₂ e (kg)	Flight distance (km)	Train CO ₂ e (kg)	Train distance (km)
2024	173,500	408,500	4.7	2,400
2025	180,000	561,000	11.0	5,600

Business travel impacts increased in 2025, mainly driven by increased flight travel activity (distance). Train travel also increased, but remains a minor part of total travel-related emissions.

Data note: Business travel figures are based on journeys booked through the company’s travel agent and provide a baseline for travel volumes and estimated emissions. The dataset does not capture all travel activity (e.g., local transport booked directly and reimbursed). In addition, the travel agent dataset includes a limited number of bookings that fall outside standard business travel reporting scope. Figures should therefore be interpreted with caution.

11.5.5 GHG emissions overview

Table 11-7 presents a summary of GAC Norway AS’ GHG emissions for 2025, prepared using the EcoVadis Carbon Estimator and supplemented with actual electricity consumption data where available. The figures follow the GHG Protocol framework and are reported in metric tons of CO₂ equivalent (tCO₂e). Scope 3 categories have been estimated using a spend-based approach. Where actual data has been used, this is indicated in the data basis column.

Table 11-7: GHG emissions overview (2025)

Scope	Emission source	tCO ₂ e	Data basis
Scope 1	Stationary combustion	0.00	Measured
Scope 1	Mobile combustion (diesel vehicles)	5.66	Measured

Scope 1 total		5.66	
Scope 2	Bergen Head Office (90,599 kWh)	2.36	Measured
Scope 2	Mongstad (36,239 kWh)	0.94	Measured
Scope 2	Remaining locations	1.42	Estimated
Scope 2 total (market-based)		4.72	
Scope 3:1	Purchased goods and services	747.80	Estimated
Scope 3:3	Fuel and energy-related activities	4.20	Estimated
Scope 3:4	Upstream transport and distribution	1,172.30	Estimated
Scope 3:5	Waste generated in operations	70.90	Estimated
Scope 3:6	Business travel	34.50	Partially measured*
Scope 3:7	Employee commuting	37.00	Estimated
Scope 3 total		2,066.70	
Total GHG emissions		2,077.08	

* Business travel figures are based on journeys booked through the company's travel agent, as described in Table 11-6. Local transport booked directly by employees is not captured in this dataset.

Note: Scope 3 categories 2, 8–15 were assessed as not relevant for GAC Norway AS' operations and are not included. Total GHG emissions represent the sum of Scope 1, Scope 2 (market-based) and Scope 3. All figures should be interpreted as an indicative baseline given the mix of measured and estimated data.

12. Appendix – Reporting references and supporting notes

12.1 Reporting basis and supporting frameworks

This Sustainability Report covers the reporting year 2025 and provides transparent, operationally anchored information about GAC Norway AS' sustainability approach, priorities and selected performance indicators. The report is prepared with reference to the GRI Standards as guidance for structure and transparency; it is not prepared in accordance with the GRI Standards.

The report is informed by established governance and internal control processes, including certified management systems:

- ISO 9001 – Quality Management
- ISO 14001 – Environmental Management
- ISO 45001 – Occupational Health & Safety Management

The report also supports the company's preparation for increasing expectations related to sustainability disclosure, including CSRD-related stakeholder expectations (see Chapter 1.3).

12.2 GRI content overview (prepared with reference)

The table below provides an overview of where key sustainability topics are addressed in this report. As this is GAC Norway AS' first sustainability report, some quantitative disclosures and datasets are not yet fully available. Where applicable, qualitative descriptions, reporting notes and planned improvements are provided (see Chapter 11).

Table 12-1: Content overview (GRI reference overview – 2025)

Topic / disclosure area	Where addressed in the report
Reporting period, scope and boundaries	Ch. 1.1 and 11.1
Reporting approach and limitations	Ch. 1.4 and 11.3
Company profile (activities, services, locations, customers)	Ch. 2.1–2.4
Workforce and employee involvement (incl. safety reps / AMU)	Ch. 2.5 and 6.4
Governance, ethics, compliance and whistleblowing	Ch. 3 and 9.8
Sustainability approach and material topics	Ch. 4.1–4.4
UN Sustainable Development Goals (SDG alignment)	Ch.4.6
Environmental management approach	Ch. 5.1 and 9.4
Waste, dangerous goods and spill prevention	Ch. 5.2-5.3 and 11.5.1
Resource efficiency and circular practices (incl. IT takeback)	Ch. 5.3 and 11.5.2
Transport and travel (influence / business travel)	Ch. 5.4, 5.5 and 11.5.3-11.5.5

GHG emissions overview (Scope 1, 2 and 3)	Ch. 5.5, 11.3 and 11.5.5
Occupational health and safety performance and approach	Ch. 6.1, 8.2 and 9.5
Training and competence	Ch. 6.2
Diversity, equality and inclusion	Ch. 6.3
Responsible procurement and supplier governance	Ch. 7
Reporting culture, QHSSE performance and continual improvement	Ch. 8 and 9.6–9.9
Customer satisfaction and feedback	Ch. 8.3
Outlook and priorities	Ch. 10

Note: This overview is provided for reader guidance and transparency and does not constitute a full GRI Content Index.

12.3 Key internal references used in reporting

The report content is based on internal and operational sources, including:

- QHSSE reporting data and follow-up documentation (GACqhsse)
- Internal audits, safety rounds, risk assessments and action tracking
- Management review documentation and established governance routines
- Internal policies and procedures (incl. HSSE, compliance, procurement and travel routines)
- Training and competence activities (mandatory training and local training initiatives)
- Supplier onboarding documentation, contractual requirements and supplier follow-up practices
- Relevant group-level inputs (e.g., engagement survey context), applied with consideration to local relevance and data boundaries

12.4 UN Global Compact – reference mapping

GAC Norway AS is a participant in the UN Global Compact and supports its Ten Principles relating to human rights, labour, environment and anti-corruption. The tables below provide a concise reference mapping to relevant content in this report to support transparency and future Communication on Progress (CoP) reporting.

This section includes a CoP-aligned navigation index (Table 12-2) and a Ten Principles reference mapping to relevant report content (Table 12-3).

Table 12-2: UN Global Compact – CoP disclosure area index

CoP area	What it covers	Ch. ref.	Annual update items
Governance	Oversight, roles and responsibilities, policies, management systems, reporting culture	Ch. 3, Ch. 8–9	Key governance changes Management review highlights Audit/safety round follow-up status
Human Rights	Commitments, due diligence in business relationships, grievance and remedy	Ch. 3 Ch. 7 Ch. 8–9	Key actions Supplier due diligence coverage/progress Cases/themes (if any)
Labour	Freedom of association and collective bargaining, forced and child labour prevention, DEI, working environment	Ch. 2.5 Ch. 6 Ch. 8–9	H&S performance DEI overview Training/engagement follow-up Cases/themes (if any)
Environment	Precautionary approach, environmental responsibility, prevention, circularity/initiatives	Ch. 5 Ch. 11 Ch. 8–10	Incidents/near misses Waste/circular initiatives Priority improvements/actions
Anti-corruption	Ethics, speak-up, prevention, third-party expectations	Ch. 3 Ch. 7 Ch. 9	Compliance training completion Speak-up cases/themes (if any) Confirmed breaches/actions (if any)

Table 12-3: UN Global Compact (UNGC) – Ten Principles coverage and report references

Principle	UNGC area	How addressed (governance + internal references)	Ch. ref.
1	Human Rights	Human rights expectations are anchored through the GAC Group Code of Ethics (Group-level requirement) and implemented locally via HR-0004 Code of Conduct, including standards for respectful conduct and non-discrimination. Concerns can be raised through speak-up/grievance channels and followed up through established case-handling routines. Third-party expectations are reinforced through supplier governance and contractual requirements under CO-0008 Purchasing and related onboarding/follow-up practices.	Ch. 3.1–3.2, 3.6–3.7 Ch. 7 Ch. 9
2	Human Rights	The company seeks to prevent adverse impacts in business relationships through supplier qualification, contractual anchoring and follow-up under CO-0008 Purchasing, supported by supplier onboarding and risk-based due diligence/assessment practices (including Factlines assessments where used) and supplier-related case follow-up (incl. escalation and corrective actions where relevant) in GACqhsse.	Ch. 7.1–7.3 Ch. 3.4 Ch. 8
3	Labour	Freedom of association and collective bargaining are respected in line with Norwegian labour legislation and established employee representation structures. Employee voice and involvement are supported through appointed safety representatives across locations and a Working Environment Committee (AMU), combined with safety rounds, reporting culture (QHSSE) and structured engagement feedback follow-up.	Ch. 2.5 Ch. 6.4 Ch. 8 Ch. 9.9
4	Labour	Zero tolerance for forced or compulsory labour is anchored through ethical conduct requirements (Group Code of Ethics and HR-0004 Code of Conduct) and reinforced through supplier governance and contractual requirements under CO-0008 Purchasing, including risk-based supplier screening/qualification and escalation/follow-up where relevant.	Ch. 3.2 Ch. 7

5	Labour	Zero tolerance for child labour is anchored through ethical conduct requirements (Group Code of Ethics and HR-0004 Code of Conduct) and reinforced through supplier governance and contractual requirements under CO-0008 Purchasing, including risk-based screening/qualification and escalation/follow-up where relevant.	Ch. 3.2 Ch. 7
6	Labour	Non-discrimination, equal opportunity and respectful workplace conduct are defined in HR-0004 Code of Conduct and supported through HR practices and compliance with Norwegian labour legislation. Relevant working environment themes are monitored and followed up through dialogue and engagement feedback mechanisms and through case handling/grievance follow-up where applicable.	Ch. 3.7 Ch. 6.3–6.4
7	Environment	The precautionary approach is implemented through the ISO 14001 environmental management system, risk assessments and operational controls relevant to warehousing/port activities, dangerous goods and prevention of environmental incidents. Environmental deviations, near misses and incidents are captured and followed up through GACqhsse. A dedicated spill response procedure is planned as part of strengthening preparedness and competence.	Ch. 5.1–5.2, 5.7 Ch. 8 Ch. 9.4 Ch. 10
8	Environment	Environmental responsibility is supported through waste sorting practices (where data and arrangements allow), hazardous materials controls, responsible purchasing routines and circular initiatives such as IT equipment takeback. Procurement requirements and follow-up are anchored in CO-0008 Purchasing and the Addendum to Procedure CO-0008 Purchasing – Company Purchasing Routine for Sustainable Purchasing.	Ch. 5.2–5.3, 5.6–5.7 Ch. 11.5

<p>9 Environment</p>	<p>The company supports development and diffusion of more environmentally responsible practices and solutions through value chain influence, including supplier expectations and follow-up under CO-0008 Purchasing and the sustainable purchasing addendum, and through logistics-related influence (consolidation dialogue, carrier selection where feasible and improved data coverage over time to support better decisions, e.g., carrier/supplier CO₂e statements and methodology notes where available).</p>	<p>Ch. 5.4–5.6 Ch. 7 Ch. 10 Ch. 11.3</p>
<p>10 Anti-corruption</p>	<p>Anti-corruption, ethical conduct and speak-up mechanisms are anchored in the Group Code of Ethics and implemented locally through HR-0004 Code of Conduct and CO-0013 Whistleblowing, supported by mandatory compliance training and structured follow-up of concerns. Controls cover typical integrity risk areas (e.g., gifts/hospitality and conflicts of interest). Supplier contracts and purchasing routines under CO-0008 Purchasing reinforce corresponding expectations towards third parties.</p>	<p>Ch. 3.1, 3.4, 3.8–3.9 Ch. 7.1 Ch. 9.8</p>

12.5 Contact point

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