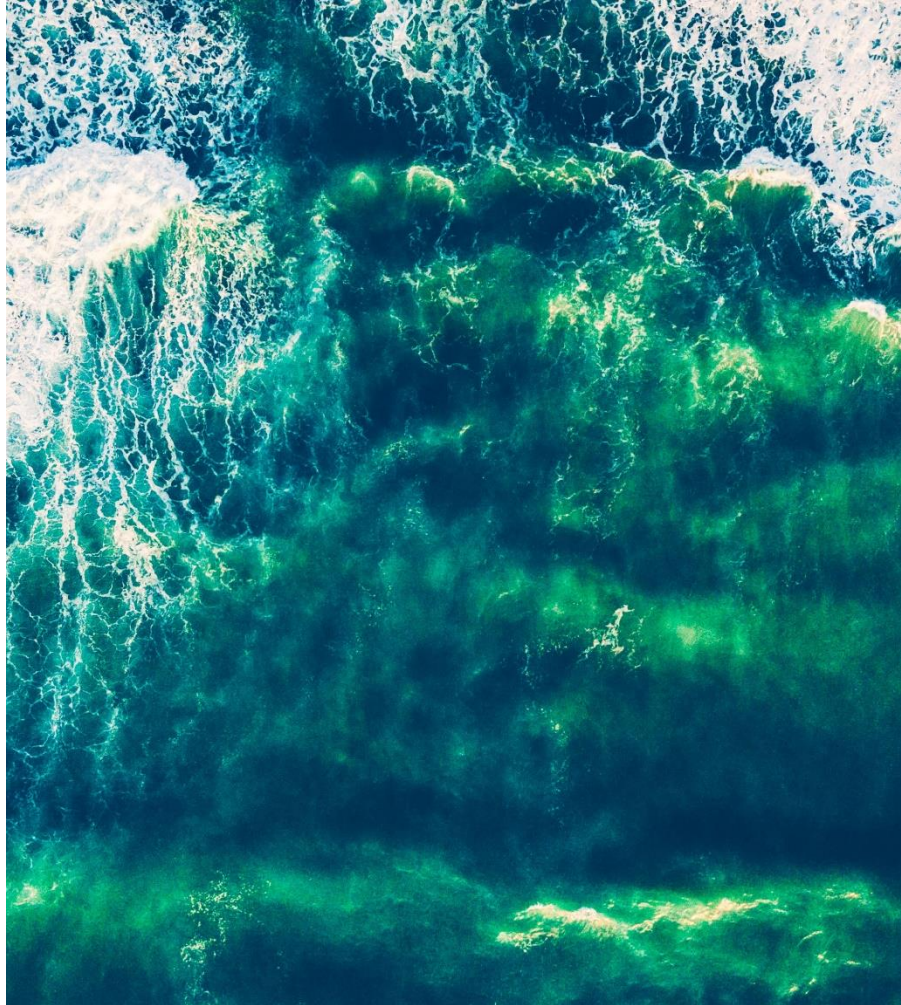




# Transparency Act - Due Diligence assessment 2022

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30.06.2023





## Contents

1.	Due Diligence assessment	3
1.1.	Abstract	3
1.2.	Introduction	3
1.3.	Methods	6
1.4.	Results	7
1.5.	Actual results and future expected results of the measures	7
1.6.	Conclusion	8



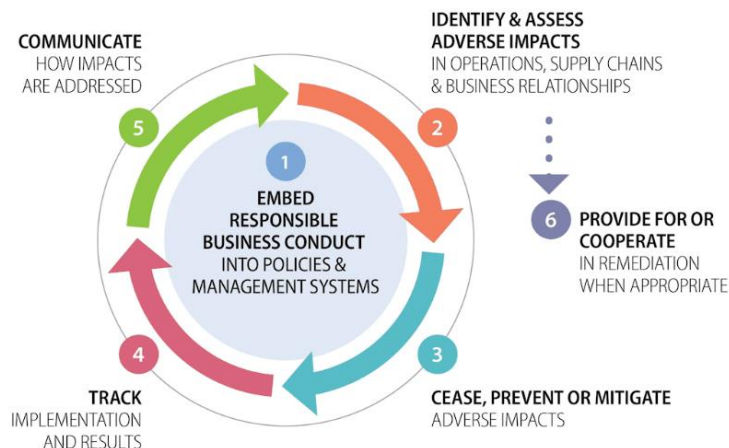
# 1. Due Diligence assessment

## 1.1. Abstract

Respecting human rights is crucial for our company's license to operate. These fundamental principles are ingrained in Field's corporate values, Code of Conduct and policies. Our commitment to human rights is an ongoing journey, where we aim for continuous improvement in our performance and behavior. This report outlines where we as a company are today and how we will approach the future to ensure that we contribute to a responsible and positive development within this area in collaboration with our partners and suppliers. This report will be updated and published by 30 June each year and otherwise in the event of significant changes in the company's risk assessments.

## 1.2. Introduction

This report is based on the UN's guiding principles for business and human rights and the OECD's model for due diligence assessments, 'OECD Guidelines for Multinational Enterprises on Responsible Business Conduct'. The model outlines six steps that businesses can follow to adopt responsible and sustainable business practices.



Transparency Gate presents: Due Diligence Guidance for Responsible Business Conduct. Source: OECD Publishing (2008).

It is important to note that being proficient in due diligence does not imply that a business has no negative impact on people, society, and the environment. Instead, it means that the business acknowledges and addresses these challenges in a transparent and collaborative manner, while engaging with its stakeholders to find the best possible solutions. Field views this as a continuous process that has just started and will strive to gradually enhance the process in the time to come. Regular due diligence reviews should be conducted minimum annually, taking a proportionate and risk-based approach.



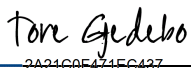
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### 1.2.1. Board review

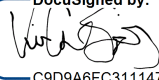
The board and CEO of Field Holding AS hereby confirm that they have received and read the due diligence report that forms the basis for the 2022 business year:

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Arild Austigard  
Chair


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Tore Gjedebo  
Board member

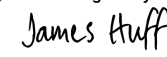
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Kjartan Melberg  
Board member

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Board member

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Elin Risvik  
Board member

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Cato Vevatne  
CEO

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James Huff  
Board member

Oslo  
30.06.2023



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Transparency Act - Due Diligence assessment 2022  
30.06.2023  
Field Public

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### **1.2.2. Key information about the company**

**Name of the company:**

Field Holding AS

**Address head office:**

Drammensveien 260,  
Vækerø Park 0283 Oslo  
Norway

**Main products and services:**

Geodata competence, Proprietary software and geospatial technologies, Aerial & land surveying, Uncrewed Aircraft Systems (UAS), Mobile mapping & geophysical services, Mapping & modelling, Land and property consultancy.

**Description of the company's structure:**

Field is represented in 5 different countries with 13 offices, and with Norwegian subsidiaries Field Group AS and Field Group Aviation for airborne operations. The Finnish operations are run through Field Finland OY, Terratec OY and SKM Gisair OY and the Swedish operation are covered by the companies Field Sweden AB and Field Group Sweden AB. Blom Data S.L.U (Spain) and Field Estonia OÜ covers production in their respective countries.

Field acquired the American company PrecisionHawk in March 2023, and this company will be included in the report updates for the future.

**Turnover in the reporting year:**

NOK 402 million

**Number of employees:**

294

**Is the business covered by the Transparency Act?**

Yes

**Significant organizational changes since the previous reporting period:**

N/A

**Name, title of contact person for the report:**

Kjell Fuglestad  
VP Quality & Safety

**E-mail address for the contact person for the report:**

[kjell.fuglestad@field.group](mailto:kjell.fuglestad@field.group)



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Transparency Act - Due Diligence assessment 2022  
30.06.2023  
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### **1.2.3. Key information about the supply chain**

#### **General description of the company's purchasing model and supply chain:**

The purchasing department handles Field's suppliers, and it uses a standardized purchasing process. A Code of Conduct for suppliers has been established. Local management/contract holders follow up on their local suppliers and business partners, in close collaboration with the purchasing department.

#### **Number of suppliers with whom the company has had commercial relations in the reporting year based on the risk-based approach as per section 1.3.1 below:**

206

#### **Is the business a supplier to the public sector?**

Yes.

### **1.2.4. Privacy Policy**

To comply with Field's duty of disclosure under the Transparency Act, Field will process personal data of individuals requesting information. Please refer to our Privacy Policy for more details. The legal basis for this processing is our obligation under the Transparency Act, as well as safeguarding our legitimate interests and establishing, enforcing, or defending legal claims.

## **1.3. Methods**

### **1.3.1. Risk-based approach**

A risk-based approach is used by mapping areas with the highest risk of negative consequences. This has been done by utilizing one or more of the following parameters:

- Focusing on suppliers from countries with negative index scoring for human rights, labor rights, environment, anti-corruption and transparency.
- The size of the supplier and how important part of the company's operation and deliveries.
- Limited selection of suppliers by annual spending criteria of NOK 50 000.

### **1.3.2. Findings**

Findings of negative conditions will be handled as follows:

- continue the collaboration in order to most effectively influence the supplier,
- interrupt the relationship temporarily while initiated risk-reducing measures are continued, or
- ultimately withdraw from the collaboration.



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30.06.2023  
Field Public

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If such findings, Field is committed to adhering to the core principles of the Transparency Act, which emphasize cooperation and continuous improvement as the preferred approach.

#### **1.3.3. Field has introduced:**

- Clear guidelines and management systems to ensure accountability.
- Analysis of both existing and potential consequences.
- Initiated integration of findings of the analysis into the company's operations to address adverse impacts.
- Will continuously monitor the company's results and progress over time using the 'Complete Control' software.
- Will report on how the consequences are being addressed and managed minimum annually.
- Establish or collaborate on recovery, compensation, and grievance procedures as needed.

#### **1.4. Results**

Below are the results of the inaugural assessments and analyses.

##### **1.4.1. Actual negative consequences uncovered.**

Limited occurrences.

##### **1.4.2. Significant risk of negative consequences uncovered.**

The limited occurrence of actual negative consequences can be attributed to the low response rate from certain international suppliers.

##### **1.4.3. Measures that the company has implemented to stop negative consequences and to limit significant risks of negative consequences.**

Field has implemented an active strategy to replace suppliers from high-risk countries with suppliers from countries known for upholding human rights, labor rights, environmental standards, anti-corruption measures, and transparency in a commendable manner.

##### **1.4.4. Measures that the company plans to implement to stop negative consequences and to limit significant risks of negative consequences.**

Field will strengthen cooperation with remaining international suppliers and suppliers in the local area, to ensure that we gain a more in-depth knowledge of the actual condition, and then address negative findings. We will also evaluate the possibility of strengthening and professionalizing the SCM function in the company.



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Transparency Act - Due Diligence assessment 2022  
30.06.2023  
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### **1.5. Actual results and future expected results of the measures**

#### **Process targets and progress in the reporting year:**

Goal: overall risk mapping

Status: done

#### **Objectives for the coming year:**

Goal: conduct a comprehensive analysis of risk categories. Develop an action plan with specific measures and assign responsibility for follow-up. Implement and actively work with the identified measures.

### **1.6. Conclusion**

The assessments conducted this year on the Transparency Act did not identify any significant negative consequences or risks. However, we recognize the need for continued collaboration with our partners and suppliers to fully comprehend the entire supply chain. This ongoing process serves as a risk management strategy, involving the evaluation, communication, and resolution of any impacts that may arise.

Field is committed to upholding responsibility throughout our value chain, which includes personnel, the working environment, the environment, and social responsibility. This commitment aligns with legal requirements stated in Section 3.3 of the Accounting Act regarding social responsibility, as well as Section 26 of the Equality and Discrimination Act.

Together with a forward-leaning, technology-driven organization, we are prepared to meet the market's and society's expectations.