

2022 | Transparency Act and Modern Slavery Statement

CAMB

An introduction from the CEO

At Cambi,

we are passionate about enabling cities and factories to transform large organic waste streams into valuable bioresources. Our success in developing scalable, reliable, low-carbon technology solutions and deploying them in countries on all continents hinges on the creativity, knowledge, and integrity of our employees and those of all business partners.

Cambi takes pride in its talented and diverse workforce and network, and we are committed to fostering fair work environments with respect for fundamental human rights across our entire chain of operations. We adhere to the Norwegian Transparency Act and the UK Modern Slavery Act and strive to ensure that every supplier and business collaborator is not just aware of but also aligned with the law and our strong stance on modern slavery, human trafficking, and the importance of human rights and decent work conditions.

As an enterprise with manufacturing in the UK and construction and maintenance activity on all continents, Cambi acknowledges the risk of unethical and criminal behaviour in its supply chain. During the pandemic, these risks were compounded in most markets by extended social distancing and travel restrictions, limiting the opportunities for face-to-face interaction, communication, monitoring, and inspections. As the pandemic receded last year, Cambi has resumed all necessary face-to-face encounters with its business partners.

With the war outbreak in Ukraine, material and supply chain shortages continued to cause delays in project execution. Cambi has been careful to avoid undue pressure on its suppliers, which could have risked product quality or could have led to human rights violations, and acknowledged that timelines had to be adjusted dynamically. Nevertheless, we could always deliver on clients' schedules and expect to be able to continue to do so, as delays and bottlenecks have been easing during the first half of 2023.





In 2022, Cambi completed the identification and risk assessment of all relevant tier-1 suppliers and business partners, specifically addressing human rights and decent working conditions. All new suppliers, third-party representatives and business partners undergo integrity due diligence (IDD) and an evaluation process including specific disclosure forms and questionnaires. Existing business partners will be re-evaluated against the same criteria during 2023.

All employees receive regular training, and the transparency processes are embedded in Cambi's Code of Conduct, policies, and procedures. The Code provides a clear framework for how we expect business to be conducted, covering health, safety, discrimination, harassment, and human rights, among other topics. A whistleblower channel through an independent company facilitates reporting on concerns and ensures a quick, confidential and fair assessment.

Human rights considerations are gradually embedded into all business processes and activities. We plan role-specific training for supply chain, site and commissioning personnel and regular assessments to identify and address any risks and potential negative impacts within our supply chain.

This statement underscores Cambi's ongoing efforts to identify, curb, and alleviate the hazards of modern slavery and human trafficking within our business operations and supply routes. It is integral to our commitment to fostering a fair and humane work environment. It is Cambi's first statement related to modern slavery, fundamental human rights and decent working conditions, in compliance with Section 54 of the UK Modern Slavery Act and Section 5 of the Norwegian Transparency Act. It covers the period from 1 January to 31 December 2022 and comprises Cambi ASA and all companies in which it holds a controlling interest.

The statement was approved by Cambi's Board of Directors on 29 June 2023.

A handwritten signature in black ink, appearing to read 'Eirik Fadnes', is written over a white rectangular area.

Eirik Fadnes

Chief Executive Officer

Business structure and supply chain

Organisation

Cambi is a medium-sized multinational enterprise delivering technology and solutions to improve wastewater solids and organic waste treatment, usually at large biogas plants. Established in 1992, Cambi has built a portfolio of proven and patented technologies, developed strong marketing, sales, and support capabilities, and can reference more than 80 installations in 25 countries on six continents.

The company is listed under the ticker CAMBI on Euronext Growth Oslo, a multilateral trading facility in Euronext, Europe's largest stock exchange platform. Quarterly reports on results and operations and detailed annual reports are available at [cambi.com](https://www.cambi.com). The turnover in 2022 was NOK 440 million.

Cambi is headquartered in Asker near Oslo, Norway, and has subsidiaries in the UK, US, Denmark, France, Spain, Germany, China, South Korea, and Singapore. The headquarters hosts all business functions except manufacturing, which takes place in Congleton, UK. The country offices are responsible for regional sales, project execution and operations support. Purchasing is done in Norway and the UK, except for sourcing related to office management and local content requirements.

The overall responsibility for decent working conditions, respect for fundamental human rights and modern slavery due diligence lies with Cambi's Chief Executive Officer, assisted by the Chief Operating Officer, with specific tasks assigned to the Director of Human Resources, Senior Quality Manager, Senior Project Managers and the procurement team. The Board of Directors receives regular reports and follows up on these matters as part of the corporate governance oversight.

In Norway, the company is a member of the Federation of Norwegian Industries (Norsk Industri) and the National Confederation of Norwegian Enterprises (NHO). Through these organisations, Cambi is aligned with the best practices for safeguarding fundamental human rights and decent working conditions while avoiding any forms of slavery or human trafficking.

An elected director represents the employees on the Board of Directors. The company has no union representation or collective bargaining, but all employees can join workers' associations.





Supply chain

Cambi's core business supplies original equipment manufactured at the wholly-owned workshop in Congleton. The main input material is stainless steel sourced mainly from British suppliers. The main products are pressure vessels, piping and other equipment making up the patented thermal hydrolysis process installations. Natural gas, electricity and water are the main utilities used in manufacturing. Most employees in the workshop are employed full-time on permanent contracts directly by Cambi.

Ancillaries such as boilers, pumps, valves, wiring, sensors, and instruments are sourced from well-reputed global suppliers. Cambi does not work exclusively with any one supplier for a specific part. Some ancillaries are customised to fit the thermal hydrolysis process, ensuring enhanced performance and durability.

The standardised and modular products are preassembled on skids or containers and freighted by ship, train or truck to their destination. Upon delivery, Cambi usually assists with installation and commissioning, carried out in collaboration with a construction company in charge of a larger project scope awarded as part of a public tender by a municipal water utility.

Cambi's direct client is usually a construction company, while the beneficial user or end client is the water utility company. The construction company is usually a well-known international contractor in large projects, while smaller projects may be awarded to regional or local companies. The water utility companies are typically owned by the municipalities they service, although private ownership or operatorship is possible in some countries.

During the operations phase, Cambi often delivers services directly to the utility company or an operator designated by them. Cambi personnel carry out most services on-site in collaboration with the ancillary equipment and parts suppliers. Modernisation works and maintenance stops may be partly subcontracted to specialised local companies.

In some projects, Cambi has a wider contract scope or acts as a turnkey supplier of anaerobic digestion or thermal hydrolysis plants. In this case, the sourcing extends to more original equipment, while construction work is typically subcontracted. Cambi also aims to deliver thermal hydrolysis as a service by financing, building, and operating wastewater solids or organic waste treatment plants with local partners. The value chain in such projects is more complex, but Cambi would usually not hold a controlling interest in the project company. No such projects are currently underway.

In Norway, Grønn Vekst handles wastewater solids and garden waste from municipalities, producing and commercialising a wide range of peat-free soil products.

Grønn Vekst is an asset-light enterprise. It collects the organic waste streams from upstream clients and blends different soils using stone meal at quarries. Transportation is arranged directly by the buyers, typically construction companies, or outsourced to local transportation companies.

In 2022, all Grønn Vekst subsidiaries carried out business exclusively in Norway.

Policies and procedures

on modern slavery, human trafficking, decent working conditions and fundamental human rights

Cambi's vision is to accelerate the transition to sustainable communities through technology solutions for effective feedstock treatment at biogas plants. The company's achievements and future success mostly depend on its diverse and highly skilled talent base. Personal development, employee well-being and team motivation are essential if Cambi is to meet its strategic objectives and prevail as the world-leading supplier of thermal hydrolysis solutions.

Against this backdrop, employment in Cambi is freely chosen, meaning that all employees consent to recruitment and have the liberty of job termination with reasonable notice. There are no worker-paid recruitment fees, no forced, bonded, or involuntary prison labour, and no child labour in the company or its subsidiaries. Employees have full freedom of personal movement and association, so long as such association is not publicly in conflict with carrying out the job responsibilities or Cambi's business interests. The company respects the employees' privacy, always follows all applicable laws and regulations in all countries and strives to always act with integrity.

Cambi is committed to ensuring equal employment opportunities for all applicants and employees. All employees are encouraged to report any issues, including harassment, isolation, intimidation, threats of violence or discrimination based on gender, culture, race, sexual orientation or any other dimensions of personal, social, or role identity. A dedicated whistleblower channel through an independent company enables reporting on any concerns, enabling quick, confidential and fair assessment and ensuring everyone in Cambi's supply chain has access to justice, remedy, and compensation.

Wages are paid regularly and on time. All employees are provided resources for skill development through yearly competence mapping and planning. The company strives to ensure internal equity across locations, departments, and gender through sound calibration procedures. Management consults on fair pay and yearly salary adjustments. Variances in pay may exist due to differences in job responsibilities, local conditions, and years of experience.





Cambi has implemented a quality management system and is certified according to ISO standards 9001:2015 and 14001:2015. The company has published quality, environmental protection, health and safety, and information protection policies. In addition, the Code of Conduct outlines clear expectations and guidelines for employees, suppliers, contractors, and business partners relating to integrity, ethical behaviour, health, safety, discrimination, harassment, and human rights.

English is the company's working language. All employees and most business partners have professional knowledge of English. It is therefore the language used for the codes and policies on Cambi's Transparency webpage and the procedures available in the company's quality system software. Grønn Vekst's main working language is Norwegian.

Integrity due diligence is formalised in Cambi's work and procurement procedures and carried out routinely for all new suppliers, business

partners and third-party representatives to ensure ethical, transparent business relationships throughout the value chain.

PricewaterhouseCoopers (PwC)'s Transparency Chain software is used for this purpose, and Cambi is collaborating with PwC to develop further and refine this tool. The software tracks red flags in human rights, health and safety, business integrity, working environment and supplier management.

Existing suppliers and business partners are in the process of being re-evaluated in 2023. Cambi has experienced some pushback from larger suppliers, who refer to their own policies, and from smaller ones, who are reluctant to comply with detailed requests for information. While seeking dialogue with all organisations and expecting a positive outcome, Cambi reserves the right to sever ties with suppliers who blatantly refuse to comply with the company's transparency routines and procedures.

Risk assessment and due diligence processes

Cambi has risk management processes to identify, assess, and mitigate risks. The company actively manages a range of market, technology, operational, financial, ethical, and governance risks. To this end, it conducts risk assessments and independent internal audits.

This chapter briefly charts the risks of modern slavery, human trafficking, lack of decent working conditions and infringement of fundamental human rights within the company's value chain. Risk assessments are carried out against the likelihood of the identified risks materialising and Cambi's leverage to prevent this from happening. Likelihood mainly depends on jurisdiction (country risk) and the type of activity in the value chain. Leverage mainly depends on Cambi's role and degree of control in the business relationship.

Country risks

In 2022, Cambi identified 75 business partners and 147 tier-1 suppliers and assessed them against pre-defined criteria. The highest risk of human rights abuses is in the countries where Cambi has employees, sources equipment, parts or raw materials, or has contracts to deliver thermal hydrolysis installations and related services. The countries with the highest risk are identified based on the Global Slavery Index 2023 and the International Trade Union Confederation's Global Rights Index 2022. Cambi mainly operates in countries with low risk of human rights abuses and sources mainly from Europe.

Value chain risk

Cambi has a good overview of its business partners, tier-1 suppliers, direct clients (usually construction companies) and end-clients (usually municipal water utility companies). Efforts to understand tier-2 suppliers and links further upstream in the supply chain hinge on the broader adoption of transparency practices in Cambi's supply chain.

In most countries and settings, the likelihood of abuse in Cambi's immediate value chain is generally appreciated as low to moderate.

Leverage

To mitigate human rights risks, Cambi does not offer exclusivity to any company in its business dealings and is always careful when choosing whom to do business with for each project, following due diligence routines. As part of the purchasing process, Cambi evaluates potential new suppliers and contractors before engagement against a list of defined criteria, including business ethics.

Cambi typically works with equipment and parts suppliers with a good reputation, based in low-risk countries where human and workers' rights stand strong. The same is true for other business partners and service suppliers. Cambi makes clear its expectations of ethical business conduct derived from the Code of Conduct. Supplier performance is assessed continuously, and Cambi reserves the right to sever ties with suppliers that fail to meet these expectations despite warnings and opportunities for remediation.

Cambi's clients are usually construction companies that win public tenders in the water and biogas sectors, following requirements and submitting proof of compliance with regulations related to human rights and decent working conditions. The end clients are typically municipal or private companies under public service obligations accompanied by strict operational scrutiny.

Several measures are being initiated to close knowledge gaps and enhance the due diligence process, described in the final chapter, *Plans for continuous improvement*.



Measurement and effectiveness

Cambi is a medium-sized organisation with global operations and a supply chain that exposes the organisation to involvement in human or labour rights infringements. However, as described in the previous chapter, the risk of becoming part of such infringements is relatively low. Management is not aware, nor have they reason to believe that any such violations may have occurred in 2022.

Cambi has a well-developed corporate management system with clear objectives related to key aspects of the company's business. Management regularly reports to the board on several performance indicators, some published in quarterly or annual reports.

The following performance indicators are relevant for tracking decent working conditions, respect for fundamental human rights, modern slavery, and human trafficking within Cambi:

- eNPS (employee net promoter score) in the anonymous employee satisfaction survey.

- Minor and reportable injuries within the company's business, tracked and published quarterly.
- NCRs (non-conformity reports) related to health and safety and the time it takes to close them.
- Gender balance in the board, management and the wider organisation, reported annually.
- The gender pay gap, reported annually as the ratio between women's and men's average salaries.
- Excessive overtime, monitored continuously by each line manager.
- Customer satisfaction score in project execution and service deliveries.
- Whistleblower cases related to human rights topics.

Management is continuously appraising the need for adjustments to the performance framework to ensure effective follow-up and the achievement of corporate objectives, including objectives relating to modern slavery, decent work conditions and fundamental human rights.



Training and capacity building

Capacity building is essential to Cambi's approach to compliance, business ethics, and sound corporate governance. Employees receive quality management training, including a thorough review of the Code of Conduct, during onboarding and repeatedly at intervals defined based on a risk assessment for each type of position in the company.

Integrity, anti-bribery, and anti-corruption dilemma training are organised as a combination of online learning modules in our eLearning software and classroom or video training in collaboration with an experienced external partner. Management, sales, and procurement team members have the highest exposure to such risks and are prioritised accordingly.

Cambi also facilitates participation in the training sessions for third-party representatives.

Health and safety reviews, fire drills and first aid training are carried out at least yearly, in line with local regulations in each place of business.

The UK organisation, Cambi Operations Ltd, based in Congleton, obtained the Principal Contractor certification from the Contractors Health & Safety Assessment (CHAS) in 2021. The certification demonstrates compliance with the CHAS requirements for health & safety, finance, environment, quality, equal opportunities, anti-bribery, corruption and modern slavery. All relevant personnel completed safety training and got the Site Management Safety Training Scheme (SMSTS) qualification.



Plans for continuous improvement

Cambi understands that the commitment to sustainable value creation for shareholders and society is closely connected with the company's capacity to ensure that workers in the entire value chain are treated fairly and respectfully. Management strives to provide decent and competitive working conditions for all employees and is developing a comprehensive risk management framework to avoid human trafficking and other human and labour rights violations throughout the value chain.

In 2023, the company plans to:

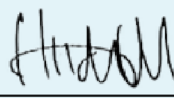
- Complete the integrity due diligence, assess all existing business partners and tier-1 suppliers against pre-defined criteria using Cambi's standard questionnaire, and use the findings to identify further necessary actions for the coming years.
- Provide the annual Code of Conduct training to all new employees and third-party representatives and role-specific training for supply chain, site and commissioning personnel.
- Translate the Code of Conduct into the languages of countries with significant business and high human rights risk rankings.
- Incorporate specific compliance clauses in Cambi's general conditions of purchase, referring specifically to the Norwegian Transparency Act and UK Modern Slavery Act.
- Develop a specific policy on modern slavery and fundamental human rights.

The Board of Cambi ASA

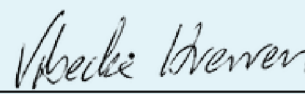
Asker, 29 June 2023



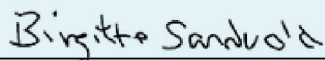
Per Audun Lillebø
Chairman of the Board



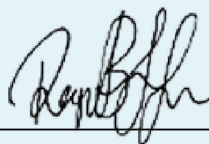
Andreas Mørk
Board member



Vibecke Hverven
Board member



Birgitte Judith Sandvold
Board member



Ragnhild Lund-Johansen
Board member
elected by the employees



Eirik Fadnes
Chief Executive Officer

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