Best Arctic Group — Transparency Act Report 2026

1. Introduction

This report has been prepared in accordance with Section 5 of the Norwegian Transparency Act. It describes how Best Arctic Group works to safeguard fundamental human rights and decent working conditions in its own operations, supply chain and business relationships.

2. About Best Arctic Group

Best Arctic Group ("BAG") consists of Best Arctic, Bussring and Farout. The Group provides transport, travel and tourism services in Northern Norway, with a focus on safe, reliable and sustainable experiences.

- **Bussring AS** is a long-established transport company and one of Northern Norway's largest tour bus operators. The company operates a modern fleet and delivers transport services based on safety, reliability and local presence.
- **Best Arctic AS** produces, markets and sells travel experiences, activities and transport services in Tromsø and the surrounding region.
- **Farout AS** offers tailor-made travel packages across Norway, Sweden and Finland, combining activities, accommodation and transportation.

3. Governance, policies and procedures

BAG continues to embed responsible business conduct into its management systems, policies and daily operations. The approach is based on the OECD Guidelines and supported by internal policies, ISO certifications, quality systems and supplier follow-up.

Key systems and measures include:

- Quality and HSE management through Plus Office and other operational systems.
- ISO certifications, including ISO 9001, ISO 14001 and ISO 39001 where applicable.
- Employment contracts, personnel policies, time registration and payroll controls.
- Respect for employees' rights to organize and cooperate with trade unions.
- Whistleblowing channels for reporting concerns anonymously.
- Updated purchasing policy with ESG requirements.
- Complete Control (software)for contract management, supplier communication and DD.
- Revised Code of Conduct published in 2025.
- Routine for handling information requests under the Transparency Act.

4. Governance and responsibility

The Board of Directors, management and employees are committed to respecting human rights and promoting decent working conditions. These principles are reflected in BAG's values, Code of Conduct, management systems and sustainable tourism strategy.

BAG aims to integrate environmental stewardship and social responsibility into its operations and supply chain, with positive effects for customers, employees, partners and local communities.

Training and awareness activities will continue for functions with particular exposure to human rights and responsible business conduct risks, including procurement, finance, operations and HR.

5. Due diligence and identified risks

Due diligence was carried out in 2025 and 2026 using Complete Control, BAG's system for supplier follow-up and contract management. The process was proportionate to the Group's size, business model and risk exposure.

The assessment combined supplier questionnaires with risk analysis based on country, sector and industry criteria. BAG has expanded its scope compared with previous years and will continue to include more suppliers in future assessments.

The main potential risk areas identified are:

- Insufficient policies, guidelines and documentation relating to decent working conditions and human rights.
- Limited reporting and documentation of compliance with human rights requirements and expectations for responsible business conduct.
- Potential gaps between established policies and actual practices.
- Incomplete or missing employee contracts.
- Extensive and insufficiently documented supply chains.

6. Supplier segmentation and follow-up

BAG segments suppliers based on risk exposure, strategic importance and replaceability. For critical suppliers, the priority is dialogue, documentation and improvement measures. For non-critical suppliers with high risk, replacement may be considered where appropriate.

Supplier follow-up will be performed at entity level for Bussring AS and Best Arctic AS, reflecting their different operational contexts. Human rights considerations will be integrated into sourcing decisions, contract management and day-to-day purchasing.

7. Key observations for BR and BA

No actual violations of human rights or decent working conditions have been identified in BAG's own operations or value chain during the reporting period. However, due diligence indicates areas that require continued supplier dialogue and monitoring.

Bussring AS: Key suppliers are generally established companies in regulated industries. The main risk is linked to complex global supply chains, especially for vehicles, spare parts and electrification. BAG will continue to prioritize suppliers with documented responsible business conduct.

Best Arctic AS: The supplier base includes both global partners and smaller local tourism operators. BAG will, based on findings from the DD, follow up supplier on guideline and expectations through its Code of Conduct and provide guidance where appropriate, particularly for local partners.

There is inherent uncertainty in the findings, as they are partly based on suppliers' self-assessments. Suppliers may interpret and evaluate their own practices, systems and documentation differently, and BAG will therefore continue to validate responses through dialogue, documentation review and risk-based follow-up.

8. Risk mitigation and action plan

To address identified risks and strengthen responsible business conduct, Best Arctic Group will implement the following measures:

1. Supplier due diligence

- Screen at least **70% of total procurement spend** annually in Complete Control, classify suppliers as **high / medium / low risk** based on country, sector and delivery type, and complete enhanced due diligence for all **high-risk suppliers within three months**.

2. Contract management and supplier follow-up

- Include the Code of Conduct and requirements on human rights and working conditions in **100% of new supplier contracts**, and update existing contracts so that at least **50% of critical suppliers** are covered within the next reporting period.

3. Implementation of Code of Conduct

- Obtain signed Code of Conduct from suppliers representing at least **70% of procurement spend**, make it mandatory in onboarding of all new suppliers, and conduct annual compliance spot checks for **high- and medium-risk suppliers**.

4. Mapping of high-risk areas

- Update the risk assessment **annually** and when significant supplier-base changes occur, and document its use in procurement decisions.

5. Prioritization of responsible suppliers

- Apply ESG criteria in supplier selection and tender processes, assess at least **two alternative suppliers** for new contracts where relevant, and reduce exposure to suppliers lacking documented responsible business conduct by **20% over the period** where feasible.

6. Grievance and remediation mechanisms

- Establish an accessible digital or third-party grievance mechanism, inform all suppliers upon contract entry, acknowledge cases within **7 days**, and complete assessment and action plan within **30 days**.

7. Diversity, equity and inclusion

- Define measurable diversity targets for board, management and relevant supplier engagement, report diversity indicators annually, and include suppliers' diversity approach in ESG evaluations.

8. Targets, KPIs and reporting

- Track KPIs for supplier screening, signed Code of Conduct, identified deviations and completed corrective actions, report quarterly to management and at least annually to the Board, and use outcomes to prioritize improvements.

9. Internal governance and accountability

- Assign CFO responsibility for KPI monitoring and reporting, COO responsibility for supplier follow-up and implementation, and HR responsibility for internal policies and training; conduct **semi-annual management reviews** and include Transparency Act compliance as an annual Board agenda item.

9. Tracking implementation and results

BAG will continue to monitor implementation through management meetings, business reviews and board reporting. Responsibilities will be allocated to relevant functions, and progress will be reviewed regularly.

The Group will rely on strong governance, clear policies, digital tools and trained employees to further strengthen responsible business conduct across its operations and value chain.

Tromsø, 26th of June 2026

Anders Høifødt	Trond Arne Kongsli
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