



# Norwegian Transparency Act Statement 2023

World Kinect Corporation, its affiliates and subsidiaries (collectively, “WK”, “World Kinect”) are committed to respecting the rights and dignity of all people and to operating in accordance with applicable human rights, employment, environment and anti-corruption laws. Further, our approach to human rights is aligned with the Norwegian Transparency Act (“the Act”) and key global initiatives, such as the United Nations (“UN”) Universal Declaration of Human Rights and the UN Global Compact.

Our Code of Conduct, Human Rights Statement, and other relevant World Kinect policies are designed to prevent human rights abuse in our operations and supply chains, including, but not limited to, slavery, forced or compulsory labour, child labour and human trafficking. This Transparency Act Statement applies enterprise-wide to all World Kinect entities and is issued with regard to our actions and activities during the financial year ending 31st December 2023.<sup>1</sup>

Relevant World Kinect subsidiaries in scope for Norwegian Transparency Act disclosure requirements are as follows: (1) Kinect Energy AS, Kinect Energy Green Services AS, Kinect Energy Spot AS and Kinect Energy Markets AS, with 84 employees based in Bergen and Oslo carrying out Energy Advisory activities; and (2) Norse Bunker AS with 3 employees based in Oslo carrying out Energy Procurement and related services to Marine industries.

World Kinect is a publicly traded (NYSE:WKC) global energy management company headquartered in Miami, Florida, with subsidiaries and affiliates operating around the world. We are principally involved in providing energy procurement and related products and services to commercial and industrial customers in the aviation, land, and marine transportation industries. We offer a broad suite of energy advisory, management and fulfillment services, digital and other technology solutions, as well as sustainability products and services across the energy product spectrum. We have expanded our product and service offerings to include energy advisory services, sustainability and renewable energy solutions, as well as supply fulfillment for natural gas and power. An area of focus continues to be advancing the energy transition to lower carbon alternatives through expanding the company’s portfolio of energy solutions and providing customers with greater access to sustainably sourced energy as well as mechanisms to compensate for residual emissions in the near term.<sup>2</sup>

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<sup>1</sup> The Sustainability and Corporate Responsibility Committee of the Board of Directors of World Kinect Corporation and the Boards of Directors of Kinect Energy AS, Kinect Energy Green Services AS, Kinect Energy Spot AS, Kinect Energy Markets AS and Norse Bunker AS have each provided their approval of this 2023 Transparency Act Statement.

<sup>2</sup> For more information regarding our business activities, please see our most recent Annual Report and other relevant corporate filings at <https://corp.worldkinect.com>

Given the nature of our business, our supply chains are connected with a variety of industries such as technology, energy generation, fuel distribution, transportation logistics, and professional services. As a result, we have adopted a number of policies and procedures designed to safeguard human rights in our own operations and supply chains. We are guided by the human rights principles of the UN Global Compact, to which WK is a signatory, and our employees are required to conduct business in accordance with the WK Code of Conduct, which outlines in detail the high standards of ethics and integrity that we expect from our employees and our business partners, as well as with the WK Human Rights Statement, which sets forth our commitment to upholding human rights in all our operations. In line with these resources, we are working to improve our understanding of how our operations and supply chains may adversely impact the human rights of people and educating our employees on how to identify and mitigate such risk in order to ensure our business remains free of human rights abuse.

As part of our global ethics and compliance program, which is overseen and enforced by our Legal Department, we have already implemented numerous policies and procedures designed to identify, respond to, and prevent unethical and illegal activities, including modern slavery and other human rights abuses. These include, but are not limited to:

- **World Kinect Code of Conduct:** The WK Code of Conduct makes clear to all employees, contractors, and agents the actions and behaviour expected of them when representing World Kinect. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating domestically and overseas, as well as when managing our global supply chain. Our Code of Conduct notes explicitly that we will not tolerate, and will not do business with partners that we know tolerate, human rights abuses including child labour, forced labour and/or human trafficking.

Our Code of Conduct is available in multiple languages at: <https://ir.worldkinect.com/corporate-governance/governance-documents>

- **World Kinect Business Partner Code of Conduct:** The WK Business Partner Code of Conduct affirms to all suppliers, contractors and agents, as well as any employees, subcontractors, and agents working on their behalf, that we require them to comply with both the letter and the spirit of all applicable laws and regulations and to act ethically at all times when doing work for us. Among other key requirements, the WK Business Partner Code of Conduct requires that our business partners conduct their activities in a manner that complies with applicable human rights laws, including, but not limited to: refusing to use forced or child labour; refusing to tolerate discrimination, harassment, abuse, or retaliation in their work place; and providing wages, benefits, and working hours that meet or exceed the applicable legal standards and regulations.

Our Business Partner Code of Conduct is available in multiple languages at: <https://ir.worldkinect.com/corporate-governance/governance-documents>

- **Additional Policies and Procedures:** We have also developed additional policies focused on human rights, worker safety, and compliance with employment regulations. These include, for example, the WK Human Rights Policy and our Health, Safety and Environment (“HSE”) Principles, which embody our commitment toward: maintaining operations free of human rights abuses; working with those business partners that comply with applicable employment laws and safety regulations; sustaining a diverse, inclusive, and safe work environment for our own employees; and overall supporting the principles of the UN Global Compact, to which we are a signatory.

In addition, we maintain a full complement of employment-related policies and procedures to help comply with local employment regulations in the many countries where we operate. Such policies and procedures are implemented through our Human Resources, Legal, HSE, and other key departments, in compliance with internal protocols.

Certain key policies and program materials are available publicly at: <https://corp.worldkinect.com>

- **Employee Education and Training:** We require all our employees to attend ethics and compliance training, both at the point of joining the company and then at additional points throughout their career. Our training is monitored and attendance recorded for future auditing purposes. Our Code of Conduct and our compliance training direct employees to contact the Legal Department immediately if they suspect any violations of our Code of Conduct, such as human rights abuses in our operations or the operations of any partner.

We have taken additional steps toward our commitment to maintaining the highest ethical standards and our desire to educate employees on how they might identify potential human rights issues and report their concerns. For example, we have created internal resources specifically informing our employees on the risks of modern slavery, such as our key policies and statements, access to modern slavery training, and other guidance materials. We will continue to look for additional, appropriately designed, ways to train key personnel to identify ways human rights abuse might enter our supply chains and to enhance our prevention practices. Enhanced in-person training for key personnel will be a focus area in 2024.

- **Compliance Hotline & Whistleblower Protections:** We encourage all of our employees, customers, and other business partners to report any concerns that they may have to their supervisors, lead business contact, and/or directly to our Legal Department. We have procedures to protect those who report their concerns, and we maintain a compliance hotline that can be accessed free of charge by telephone or online, 24 hours a day, 7 days a week. The hotline, which allows for anonymous disclosures, is managed by an independent third-party company. All reports, including those related to human rights abuse, will be reviewed and acted upon as appropriate by our Legal Department. We make our hotline available to all stakeholders online in multiple languages at [www.wfscpliance.com](http://www.wfscpliance.com).

- **Assessments and description of human rights risks:** In our operations we do not utilize forced or compulsory labour and all our employees are of legal age and employed under conditions that comply with applicable laws and regulations. The area of highest risk for World Kinect is in our supply chains and we have assessed our activities and those of our suppliers as regards to human rights risks, considering, for example, our differing lines of business, hiring practices, supplier vetting, geography of operation, and risk mitigation efforts described in this Statement. Key stakeholders, such as members of our Legal Department and compliance team, engage with key business units and leadership across our operations with the goal of better understanding current and planned business activities, their potential legal implications, and supply chain risks, including potential human rights risks. Our compliance programme continuously seeks to identify ways to improve engagement across operations and this will be a focus area in 2024.
- **Third Party Due Diligence:** We will refuse to do business with, or discontinue ongoing business with, any partner that fails to meet our ethical standards. In addition to our Business Partner Code of Conduct, we undertake risk-based due diligence when considering new partners, including suppliers, as well as when reviewing existing partner relationships. Depending on the activities of a supplier, their location, and/or other specific risks, we may require additional information and/or confirmations related specifically to the supplier understanding.
- **Contractual Requirements:** In addition to other measures such as our Business Partner Code of Conduct, and depending on relative risk and specific circumstances, we may require suppliers and other third-party vendors to sign specific human rights related certifications and/or for their contracts to include clauses specific to their compliance with, for example, applicable labour laws, employment regulations, and anti-modern slavery efforts.
- **Assessing Effectiveness:** Our approach to managing the risk of modern slavery forms part of our broader efforts to respect human rights and we are always striving to enhance our supplier vetting processes. In 2023, we undertook a number of activities to better assess our performance. These included targeted in-country assessments to better understand our potential human rights risks and impacts in high-risk operating environments.

The World Kinect Legal Department has oversight of this Norwegian Transparency Act Statement and related policies and procedures. It will be reissued at the end of each financial year to provide further updates on the steps we have taken to assess and address the risk of human rights abuse in our operations and supply chains.

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## Signatures to the Norwegian Transparency Act Statement for year 2023

Dated the 20 day of June 2024.

Signed by all board members:

**Kinect Energy Spot AS**

**Kinect Energy Green Services AS**

**Kinect Energy Markets AS**



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Richard D. McMichael, Director



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Therese Gjerde, Director

**Kinect Energy AS**



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Richard D. McMichael, Director



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Tobias Maier, Director

**Norse Bunker AS**



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Richard D. McMichael, Director



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Michael J. Ranger, Director