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**Cubility Transparency Statement**

## Introduction

At Cubility AS, we are committed to responsible and transparent business practices that uphold fundamental human rights and decent working conditions. As a Norwegian technology company operating in the global oil and gas industry, we recognize our responsibility to understand, assess, and address potential risks throughout our value chain. This statement is issued in accordance with Section 5 of the Norwegian Transparency Act (Åpenhetsloven) and outlines how Cubility works with human rights due diligence.

The Transparency Act is a vital legislative initiative aimed at increasing accountability among larger enterprises operating in Norway. It requires companies to be open about how they identify and manage risks to people in their own operations and in their supply chains. At Cubility, we see this not only as a legal obligation but as an opportunity to strengthen our integrity and our commitment to ethical conduct.

## About Cubility

Cubility AS is a Norwegian technology company headquartered in Sandnes, Rogaland, and part of the Techhouse Group. Techhouse is owned by Triton Partners, a leading European mid-market investor founded in 1997, specializing in Business Services, Industrial Tech, Healthcare, and Consumer sectors.

Founded in 2005, Cubility specializes in innovative separation and water treatment solutions for industries such as oil and gas, mining, and construction. Our core products include the MudCube®, primarily used in offshore drilling operations, and the PureCube, designed for solids-liquid separation in mining and construction applications.

We operate with a highly skilled and dedicated team, and collaborate closely with a network of external manufacturing partners and suppliers, primarily based in Norway and Europe. While our direct supplier base is limited, many of our products depend on multi-tiered global supply chains—highlighting the importance of systematic risk management and human rights due diligence throughout our value chain.

## Governance and Responsibility

The Board of Directors has ultimate oversight for Cubility's compliance with the Transparency Act. Responsibility for operational implementation lies with the CEO, supported by the QHSE Manager and Head of Procurement.

Our internal framework includes:

- Code of Conduct (employees)
- Supplier Code of Conduct
- Whistleblower Policy
- Ethical Procurement Guidelines
- Anti-corruption and Human Rights Policy

These documents are regularly reviewed, and all staff involved in supplier management receive targeted training.

## Our Approach to Responsible Business Conduct

Cubility's approach is based on the OECD Guidelines for Multinational Enterprises and the six-step due diligence model:

- Embed responsible business conduct in policies and systems
- Identify and assess actual and potential negative impacts
- Cease, prevent or mitigate adverse impacts
- Track implementation and results
- Communicate how impacts are addressed
- Provide for or cooperate in remediation if needed

We have formalized this process into our procurement routines and project workflows.

## Risk Identification and Assessment

In 2024, we conducted a structured mapping of our key suppliers and business relationships. The assessment covered approximately 40 active suppliers, with priority given to those based outside the EEA or operating in sectors flagged by DFØ's high-risk list.

We assessed risk across several criteria:

- Geographic exposure (e.g., Asia, Eastern Europe)
- Industry-specific concerns (e.g., electronics, machining)
- Type of labour and service delivery model
- Use of subcontractors

The analysis indicated that while Cubility operates primarily in low-risk contexts, there are potential risks related to:

- Occupational health and safety practices among third-party transport and logistics partners
- Transparency and documentation gaps among new vendors in indirect procurement categories

No confirmed human rights violations were identified, but improvement areas were noted.

### Measures Taken

To address and manage risks, we have implemented several key measures:

- Mandatory signing of our Supplier Code of Conduct for all high-risk vendors
- Integration of due diligence checks in onboarding of new suppliers
- Contractual clauses requiring documentation of ethical standards
- Screening of all new suppliers against sanction and watch lists
- Establishment of a whistleblower channel for all stakeholders

### Monitoring and Follow-Up

Cubility tracks the effectiveness of these measures through quarterly internal reviews and an annual reassessment process. Any suppliers flagged during the review are followed up directly by procurement or QHSE for further dialogue or corrective actions.

We also maintain documentation of supplier assessments and feedback, and monitor for red flags such as changes in country risk ratings or media reports.

### Improvement Areas and Way Forward

In 2025, we aim to:

- Expand supplier assessments to include selected tier-2 vendors
- Launch an internal awareness campaign on the Transparency Act
- Improve data quality in procurement systems for better risk tracking
- Translate key policies to additional languages for broader supplier understanding

### Communication and Inquiries

Transparency is a core value at Cubility. In line with Section 6 of the Transparency Act, any person may request information about how Cubility manages risks related to human rights and working conditions. Inquiries can be directed to: [post@cubility.com](mailto:post@cubility.com)

We are committed to providing written responses within three weeks as per legal requirements.

### Publication

This statement is publicly available on our website: [www.cubility.com](http://www.cubility.com). It is reviewed annually and updated accordingly as part of our commitment to transparency and continuous improvement.