

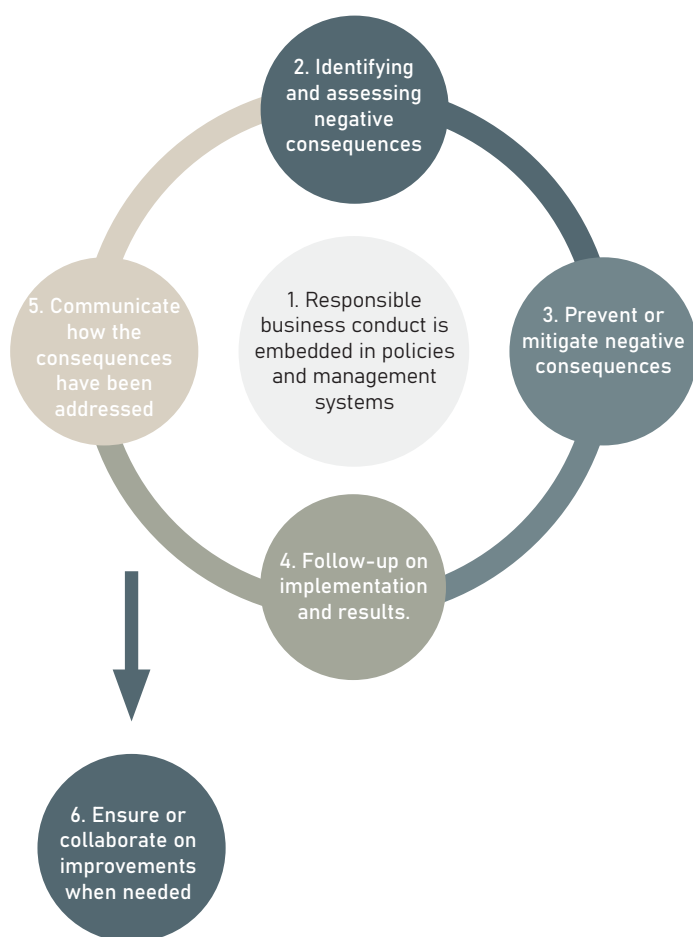
# The Norwegian Transparency Act - statement from IKM Group AS

We can only gain trust from society, customers, employees, and other stakeholders by applying high ethical standards. We believe this can be achieved by always following applicable laws, acting socially and environmentally responsibly, and applying ethical principles in our business conduct.

IKM requires that every employee be aware of, understand, and be committed to conducting business in accordance with these standards and in full compliance with all applicable laws. Furthermore, IKM holds our business partners to the same expectations and will not collaborate with business partners who do not respect:

- The United Nations Universal Declaration of Human Rights
- The United Nations Guiding Principles on Business and Human Rights (UNGPs)
- The United Nations Global Compact (UNGC)
- The Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO)
- Our Code of Conduct

IKM's risk assessment on human rights and decent working conditions is based on the [Transparency Act](#) and the "[OECD Guidelines for Responsible Business Conduct](#)."



### 1. Responsible business conduct is embedded in policies and management systems

Environment, social responsibility, and governance are essential for IKM, and sustainability is embedded in our internal guiding documents and policies. IKM Group's subsidiaries covered by the Transparency Act are required to conduct risk assessments.

IKM has the following policies and systems that require the protection of human rights and decent working conditions:

- Sustainability Policy
- Code of Conduct for employees
- Code of Conduct for Business Partners
- Procedures for Supplier Evaluation and Approval
- Procedures for Integrity Due Diligence of IKM Group's business partners

All our suppliers are required to follow our Code of conduct for Business Partners, undergo integrity due diligence according to our procedures, and follow other supplier approval processes.

### 2. Identifying and assessing negative consequences

As part of our due diligence assessments, IKM conducts a risk assessment of all suppliers in our subsidiaries covered by the law.

The supplier list is subject to a risk assessment at least every three years.

**Risks are assessed based on:**

- Risks related to child labor and forced labor (USDL list)
- Country of production/country risk (CPI, ITUC)
- Industry/sector (DFØ – high-risk list, collective bargaining agreements, labor inspectorate's registry)
- Category of goods (DFØ – high-risk list)
- Volume

**3. Prevent or mitigate negative consequences**

We use a risk-based approach where we focus our efforts on areas where the risks to people, society, and the environment are highest. If necessary, IKM will conduct audits and investigations of suppliers. This right is outlined in our procurement terms and conditions.

In our risk assessment for 2022, we have identified the use of hired labor, suppliers from the transport industry, and the cleaning industry as the highest-risk areas in our value chains.

IKM Group will monitor and follow up on areas related to high risk and implement necessary measures as needed, such as various types of training initiatives.

**4. Follow-up on implementation and results**

We regularly review our plans and measures to ensure their desired effectiveness.

Evaluations, actions, and any deviations are reported to the Compliance officer and the board of directors at least once a year.

**5. Communicate how the consequences have been addressed**

We have published general information about how we conduct due diligence assessments on the company's website. We also inform that those who have questions about this can send inquiries to [compliance@IKM.no](mailto:compliance@IKM.no).

In 2022, we did not receive any inquiries related to this.

**6. Ensure or collaborate on improvements when needed**

If we discover any violations of fundamental human rights and decent working conditions, we will rectify the situation ourselves or use our influence to have the responsible party correct the harm.

We have not identified any violations of human rights and responsible working conditions in 2022.