



NORSKE BACKER AS

STATEMENT - TRANSPARENCY ACT 2025

About Norske Backer AS

Norske Backer AS is an industrial company located in Kongsvinger that manufactures heating elements and customized solutions based on electric heating. Our products are delivered to, among others, the oil and gas industry, maritime sector, and process industry. We are organized into three departments: administration, production, and mechanical, and have established internal guidelines and HSE responsibilities to ensure safe and fair working conditions. As part of NIBE Industrier, we follow the group's guidelines, including the Business Code of Conduct, which is also distributed to our suppliers.

Measures Implemented in 2024

Throughout 2024 we have established and developed our routines for our due diligence assessments through the following measures:

- Established fixed routines for obtaining signed Business Code of Conduct from all new suppliers before entering into agreements.
- Collected signed Codes for Suppliers from nearly all existing suppliers.
- Followed up with suppliers who have not responded to our survey or submitted a signed Code of Conduct.
- Approved suppliers' own ethical guidelines where these align with our requirements.

Plans and Measures for 2025

In 2025 we will strengthen our work on due diligence by implementing and carry out the the following:

- Conduct a more thorough risk assessment of all suppliers, with particular focus on those not subject to Norwegian or European transparency legislation.
- Establish a system to score suppliers based on risk. The risk assessment will include factors such as geographic location, industry, past history, and available documentation.

- Use a point-based methodology where suppliers are evaluated on criteria such as compliance with human rights, working conditions, and environmental impact.
- If a supplier receives a low score and has not signed the Code of Conduct, we will require improvement measures within a given deadline.
- If the supplier does not comply with the requirements or cannot document satisfactory working conditions and respect for fundamental human rights, we will terminate the collaboration and seek alternative suppliers.
- Continue ongoing follow-up and documentation of new suppliers, including the requirement for a signed Code of Conduct before cooperation is established.

Follow-up and Escalation

We have established a process for follow-up and escalation in cases of non-compliance:

- The first step is a written reminder and a request for documentation.
- If this is not complied with, a risk assessment and dialogue with the supplier will be conducted.
- In case of continued non-compliance, specific improvement measures will be required.
- If the measures are not implemented within the deadline, the collaboration will be terminated where possible.

Negative consequences

Negative consequences according to the Transparency Act refer to harmful or undesirable effects that may arise from a company's activities, especially in relation to human rights and working conditions. This can include violations of worker rights, environmental damage, or other forms of unfair treatment.

In our preliminary investigations, we have not uncovered any negative consequences among our suppliers. Should such consequences be discovered, we will immediately take action. This may involve demanding the supplier to rectify the issues, or in severe cases, terminating the collaboration with the supplier.

Complaint Handling

We have procedures for handling complaints and inquiries related to the Transparency Act. All inquiries are treated seriously, and we ensure they are answered by the appropriate person in the company. If necessary, we will conduct further investigations to provide a well-informed response. All complaints are documented, and necessary follow-up actions are taken.

Signed by the board and CEO:

Christer Fredriksson, Chairman (*sign*)

Michael Laursen, Board Member (*sign*)

Aina Nordhaug, Employee Representative Board Member (*sign*)

Hans Petter Tråstadkjølen, Employee Representative Board Member (*sign*)

Tom Owe Mikalsen, Managing Director (*sign*)

