

Transparency Act Report

Hareid Elektriske AS - 2022

Account of due diligence assessments, Hareid Elektriske AS,
Norwegian Register of Business Enterprises NO 912 425 886 MVA.



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1. The 2022 Transparency Act Report

1.1 Introduction

Hareid Elektriske AS shall annually conduct due diligence assessments in accordance with the Transparency Act and publish an account of the assessments.

The purpose of the Transparency Act is to promote companies' respect for fundamental human rights and decent working conditions.

This report accounts for the company's duty to report on the due diligence assessments conducted for 2022. The report also describes the measures assessed and implemented to reduce the risk of potentially negative impact from the company's activities and business relationships on fundamental human rights and decent working conditions.

1.2 Contact Information

Please direct any inquiries related to the report to:

Hareid Elektriske AS

Managing Director, Olav Haug Vikebakk

E-mail: ohv@hareidgroup.com

1.3 Obligation to report

The company is headquartered at Raffelneset 6, Hareid, Norway.

Hareid Elektriske AS is the parent company in Hareid Group. On the balance sheet date, the group had sales revenues of NOK. 1.020.128.362,-, balance sheet sum of NOK 563.815.297,-. The company is therefore obligated to report.

2. The company's activities

2.1 Organisation and area of operations – Hareid Elektriske AS

Hareid Elektriske AS, headquartered in Hareid municipality, is the parent company of Hareid Group and has six wholly owned subsidiaries; HG Teknikk AS, HG International AS, HG Elektro AS, KLAR Energy AS, HG Handel AS and HG Support AS,

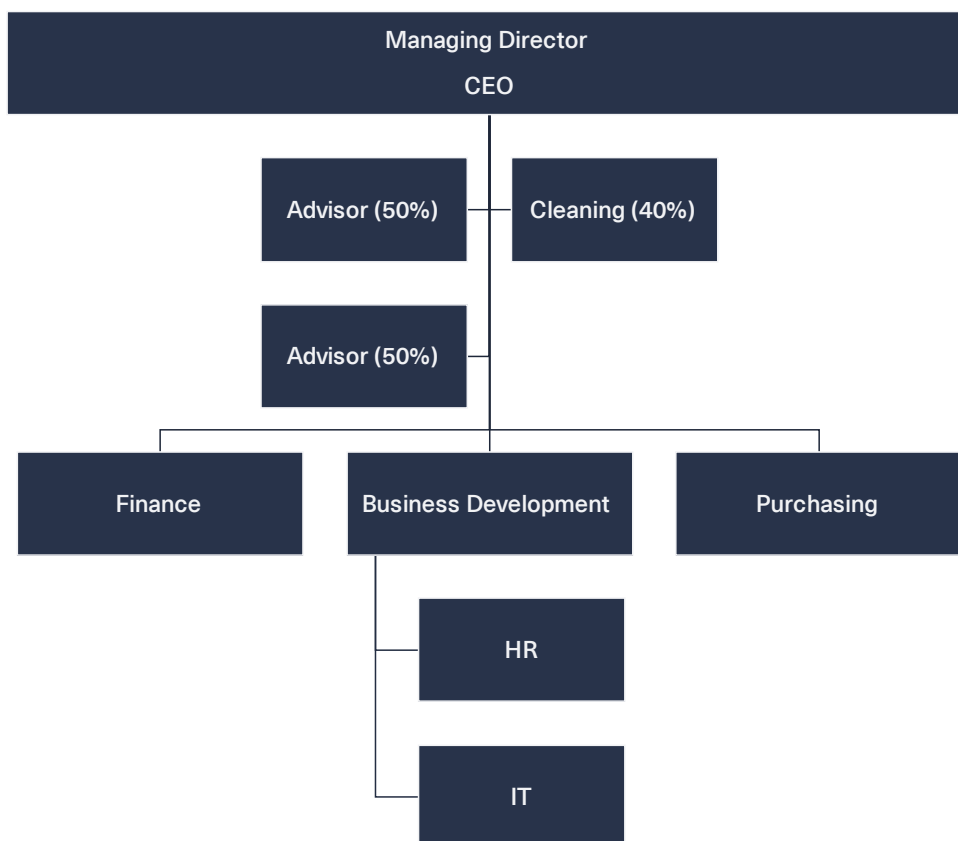
The company is also the majority owner of, HG Solutions Sp.z.o.o. Poland with 60%, Polar EI AS, Greenland with 51% and Humlen og Molvær Elektro AS, Langevåg, with 67% direct and indirect ownership.

Hareid Elektriske AS has 38 shareholders, of which Jeasimo AS and Bjåstadbakken AS own 39.92% of the shares each. The remaining shares are owned by current and former employees of Hareid Group.

In 2022, the company had a turnover of NOK 21,3 million and delivered an annualized profit of NOK 1,6 million.

Hareid Elektriske AS provides services related to functional, professional support and management to the subsidiaries of Hareid Group. In addition, the company manages its own properties at Hareid.

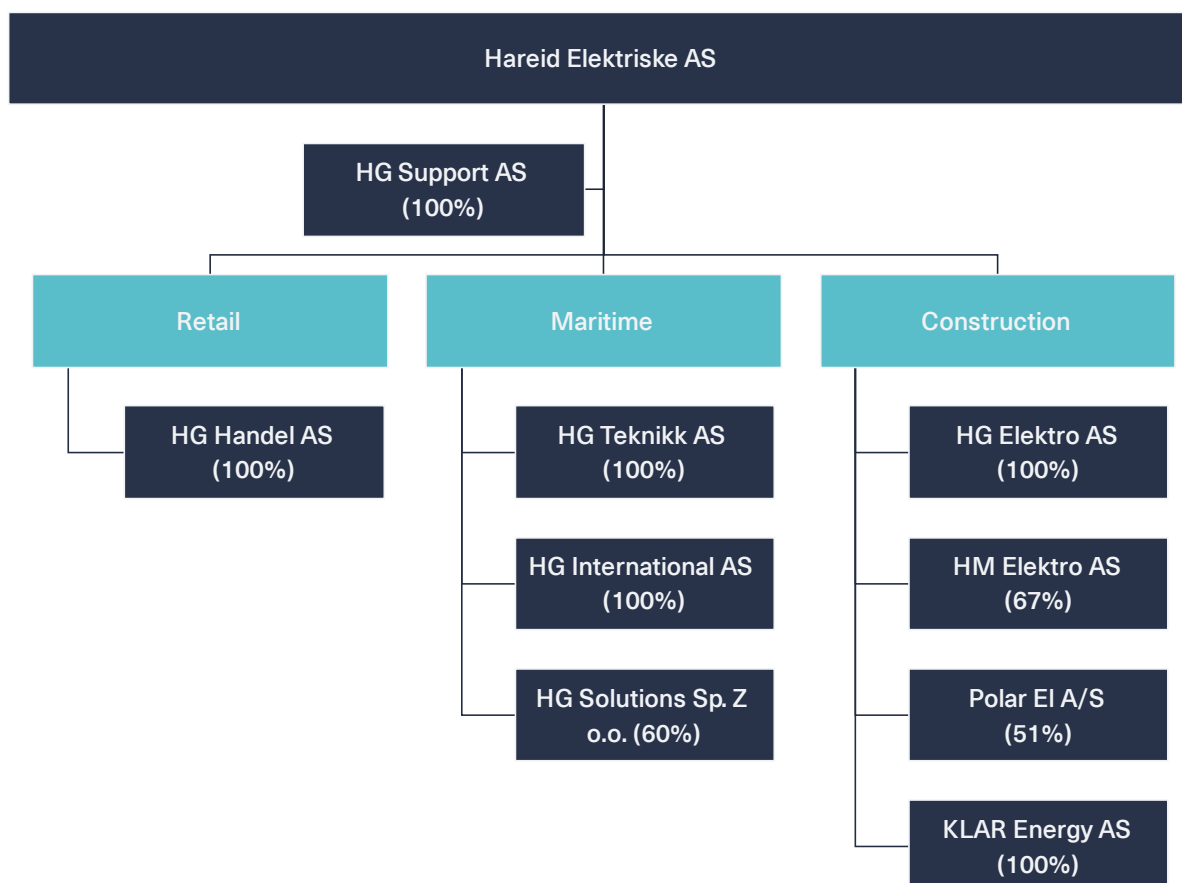
Organisation per 31.12.22:



In 2022, the company had 7.4 full-time equivalents.

2.2 Organisation and area of operations – Hareid Group

The Hareid Group of which Hareid Elektriske AS is the parent, consists of 10 companies in Norway, Poland and Greenland (Hareid Elektriske AS's ownership interest in brackets):



In 2022, Hareid Group had 433.4 full-time equivalents, a turnover of NOK 1.02 billion and an annual profit of NOK 30.6 million.

The operating companies in Hareid Group operate within three business areas: retail, maritime and construction. The market and business models, and thereby organisation and area of operation, are different for these three business areas.

1. Maritime

The Group's maritime activity is organised into three legal entities (Hareid Elektriske AS's ownership interest in brackets):

1. HG Teknikk AS – Hareid, Norway (100%)
2. HG International AS – Hareid, Norway – (100%)
3. HG Solutions Sp. z o.o. – Gdynia – Poland – (60%)

The maritime business supplies the full range of electrical products and services for the maritime industry, mainly in Norway and Poland, with occasional projects in other countries in Northern Europe. The business delivers to larger projects on new buildings and renovations, and to smaller service assignments. In addition, the companies offer product deliveries within power systems, automation and maritime electronics.

The scope of delivery includes:

1. Design and system integration
2. Project management, coordination and planning
3. Electrical steel and electrical installation
4. Deliveries of installation material
5. Cable installation
6. Boards and distributions
7. Navigation and communication systems
8. Fire alarm and emergency light installations
9. Network installation
10. Completion, testing and commissioning

2.2.1 Construction

The Group's activities within construction are organised into three legal entities (Hareid Elektriske AS's ownership interest in brackets):

1. HG Elektro AS – Hareid, Norway (100%)
2. Humlen & Molvær Elektro AS – Langevåg, Norway (67%)
3. Polar EL AS – Nuuk – Greenland (51%)

The companies supply electrical installations, materials and products for new buildings, renovations, conversions and for smaller service assignments.

The scope of delivery includes:

1. Engineering
2. Project management, coordination and planning
3. Deliveries of installation material
4. Cable installation
5. Boards and distributions
6. Fire alarm, emergency light installations, surveillance and access control
7. Network installation
8. Completion, testing and commissioning

2.2.2 Retail

The Group's activity in retail is organised in one company, HG Handel AS, which operates four warehouses as a franchisee in Elkjøp, the Nordic's largest consumer electronics retailer. HG Handel AS operates as part of the Elkjøp concept and the company's daily operations are part of Elkjøp in terms of product portfolio, processes, methodology, marketing, purchasing and management systems.

The company's four stores are all located in the county of Møre og Romsdal:

1. Volda
2. Ulsteinvik
3. Ålesund
4. Molde

2.3 Internal guidelines

The company has its own routines for anchoring work on human rights and decent working conditions, see "Routines for anchoring the work on the Transparency Act for Hareid Elektriske AS" attached to this report. The routine includes the company's work to meet the requirements set out in the Transparency Act.

The company's procedures have been endorsed and adopted by the company's Board of Directors on 29.06.23. The routine is communicated to the company's employees and is available on the company's intranet site. The company conducts regular courses on the Transparency Act and the company's routines related to the Act.

The procedure describes how the company conducts its due diligence and assessment of measures. The procedures also contain information about the company's whistleblowing channels, which are intended to help uncover negative consequences for fundamental

human rights and decent working conditions related to the company's activities, and how such information is followed up.

2.4 Objectives and progress

2.4.1 Overall goal and progress

The company works continuously to assess risks associated with its activities and the use of business partners (direct suppliers and other business partners). Furthermore, the company works continuously to implement measures to achieve the goals set by the company. See sections 3 and 4 of the report for information on the work done for the reporting year.

2.4.2 Goals for the coming year

Specific targets for the coming year:

Objective	Status
We will further develop our due diligence assessment on the basis of the experience gained during the first reporting period	In progress
We will raise the competence internally in our company when it comes to sustainability and responsible purchasing practices	In progress
We will expand the due diligence assessment to include some of the larger subcontractors to first-tier suppliers	In progress
We will further develop our due diligence assessment on the basis of the experience gained during the first reporting period	In progress
We will improve the internal competence when it comes to sustainability and responsible purchasing practices.	In progress

3. The due diligence assessment

3.1 Introduction to the company's due diligence work

HG Teknikk AS continuously assesses the risk of negative consequences for fundamental human rights and decent working conditions related to the company's business activities. The company continuously investigates human rights violations and violations of decent working conditions related to the company's activities.

3.2 Supply chain and business partners

The company had commercial relationships with three first-tier suppliers in the reporting year. The Company's suppliers are located in the following countries/geographical areas:

Country/geographical area:	Number of suppliers
Norway	3

The company has commercial relationships with 144 business partners in its reporting year. The company's business partners are located in the following countries/geographical regions:

Country/geographical area:	Number of business partners
Norway	136
Sweden	1
Poland	1
Australia	1

3.3 Prioritization of own operations and suppliers/business relationships

In its due diligence assessment for 2022, Hareid Elektriske AS has chosen to prioritise the following:

3.3.1 Own operations

The company's subsidiaries HG Teknikk AS and HG Solutions Sp.z.o.o have conducted due diligence assessments of Hareid Elektriske AS based on the fact that Hareid Elektriske AS is a supplier of premises, housing and various administrative services to its subsidiaries.

When conducting due diligence assessments of its own activities, Hareid Elektriske AS has chosen to include the results of the due diligence assessments carried out by the subsidiaries.

3.3.2 Subsidiaries' operations

Hareid Elektriske AS has chosen to prioritise conducting an overall mapping and due diligence assessment of the three subsidiaries that are subject to reporting requirements pursuant to the Transparency Act:

- HG Teknikk AS
- HG Handel AS
- HG Solutions Sp.z.o.o NUF

3.3.3 Suppliers and business partners

Assessment of the company's own suppliers/business partners

The operations of Hareid Elektriske AS in isolation are not of such a size that the company is subject to the reporting obligation. The reason why Hareid Elektriske AS is subject to the reporting obligation is that the subsidiaries are of such a size that the parent company is subject to the reporting obligation.

The company has identified the countries in which the company's suppliers and business partners operate (see section 3.2). This survey revealed that one of the business partners operates in Australia, where, according to the 2022 ITUC (International Trade Union Confederation) survey, there is a high risk of human rights violations and decent working

conditions (systematic violations). The Company has conducted a due diligence assessment in relation to the deliveries from the said business partner.

The remaining suppliers and business partners do not operate the countries where there is the greatest risk of human rights violations and decent working conditions (systematic violations) according to the ITUC (International Trade Union Confederation) survey for 2022. Against this background, no further mapping has been made of the other of the company's suppliers and business contacts.

Assessment of the subsidiaries' suppliers/business partners

For the reporting year, Hareid Elektriske AS has chosen to limit the due diligence assessments associated with the subsidiaries' suppliers to contributing to the due diligence assessments conducted by the three subsidiaries that are subject to the reporting obligation pursuant to the Transparency Act; HG Teknikk AS, HG Handel AS and HG Solutions Sp.z.o.o NUF. The other subsidiaries in the Group largely use the same suppliers as HG Teknikk AS. Thus, in the due diligence assessments carried out during the assessment period, the majority of the Group's suppliers and business partners have been assessed for due diligence (measured in volume).

3.4 Overview of the company's due diligence methodology

3.4.1 Due diligence methodology related to external suppliers and business partners

Hareid Elektriske AS is part of the Elnett Group, an alliance consisting of 19 regionally large electrical contractors. The alliance has on behalf of, and in close cooperation with, its members conducted due diligence assessments related to products and suppliers relevant to the Group's members.

Hareid Elektriske AS has largely based its due diligence assessments of product suppliers on the work done in and through the alliance, and Hareid Elektriske AS has used the same methodology in the due diligence assessments of priority suppliers and business partners.

A digital platform developed by Ignite Procurement AS has been used for the mapping, simplifying the implementation of due diligence assessments in accordance with the requirements of the Transparency Act.

Preliminary assessments have been made of the risk of negative impact on fundamental human rights and decent working conditions based on a systematised overview of first-tier suppliers, business partners and other known subcontractors.

The particular steps in the assessment:

1. Based on supplier data obtained from accounting data, order confirmations and internal ERP systems, a complete overview of the company's first-tier suppliers and business partners is created. The list of first-tier suppliers is updated continuously.
2. Supplier information is enriched through third-party collaboration with professional providers of company information. Suppliers' information and financial data such as industry codes (NACE) is obtained through the digital platform.
3. Through steps 1 and 2, the company gets an overview of first-tier suppliers, business partners and other known subcontractors, with associated supplier information.
4. Using the platform's built-in risk evaluation tool, an initial risk classification of the company's first-tier suppliers, business partners and other known subcontractors is generated based on geography and industry. The risk set to "high", "medium" or "low" based on potential negative impact on fundamental human rights and decent working conditions.
5. As part of the risk mapping, the company has distributed custom questionnaires to obtain additional information, documentation and certifications from a defined set of first-tier suppliers, business partners and other known subcontractors.
6. Based on the findings in paragraphs 4 and 5, the company assesses what measures should be taken to investigate potential negative impacts on fundamental human rights and decent working conditions. The company has implemented measures where the severity and probability of injury are greatest and where the company has the best chance to enable positive development. Prioritisations are linked to the

company's affiliation with and responsibility for the risk, and must be proportionate to the size, nature and context of the business.

7. The company has involved stakeholders, suppliers and business partners in implementing the measures.

Supply chain analyses have been prepared based on supplier data, the outcome of the risk assessment and information obtained from the supply chain. Section 3.5 below provides a more detailed description of the information collected and the detailed risk evaluation of the prioritised suppliers.

Factors relevant for the due diligence assessment of the company's activities and business relationships:

1. The company's operational context
2. The company's business model
3. The company's position in the supply chain
4. Type of products and services

3.4.2 Additional due diligence assessments related to the company's own activities

Hareid Elektriske AS has to a large extent been involved in the due diligence assessments carried out by the subsidiaries during the assessment period, and the parent company is involved in the overall management and control of the subsidiaries. In addition to the overall mapping as described in section 3.4.1, the company has made its own assessments related to the risk of negative consequences that the subsidiaries' activities may have for fundamental human rights and decent working conditions.

3.5 Due diligence assessments of the company's and its subsidiaries' activities and its suppliers/business partners

The following provides a more detailed account of any significant risk of negative consequences for human rights and decent working conditions that have been revealed through the company's due diligence assessments. The report also covers any established violations of human rights and decent working conditions.

3.5.1 The company's own activity

HG Teknikk AS and HG Solutions Sp. Z o.o. NUF has conducted due diligence related to the parent company Hareid Elektriske AS, which rents out homes to HG Solutions Sp. Z o.o. NUF and office, warehouse and production facilities to HG Teknikk AS and other subsidiaries and also provides administrative services and professional advice to HG Teknikk AS and other subsidiaries.

When conducting due diligence assessments of its own activities, Hareid Elektriske AS has chosen to include the results of the due diligence assessments carried out by the subsidiaries.

When mapping and assessing risk, methodology as described in section 3.4.1 has been used. The following initial risk assessments have been made:

Industry risk:

The assessment of industrial risk is based on the European Bank of Reconstruction and Development's index that links social risk to NACE codes.

Hareid Elektriske AS is registered with NACE code 68.2 (Rental of own or rented real estate otherwise). The deliveries are considered to have a medium risk of negative impact on the environment, medium risk of negative impact on social conditions, which gives an overall medium industry risk.

Geographical risk:

Assessment of risk based on the ITUC index of probability of internationally recognised collective labour rights being upheld by governments and employers in different countries. The methodology is rooted in standard fundamental rights in the workplace, in particular the right to freedom of association, the right to collective bargaining and the right to strike.

The deliveries from Hareid Elektriske AS are considered to have a low risk of negative impact on standard fundamental rights according to the ITUC's index based on geographical risk.

Social risk:

Assessment of risk built on Ignite score based on quantification and compilation of industrial risk and geographic risk.

The deliveries from Hareid Elektriske AS are considered to have a medium overall social risk.

Own risk assessment:

In addition to initial assessments of industrial risk, geographical risk and social risk, HG Teknikk AS and HG Solutions Sp.z.o.o have conducted an additional risk assessment based on their own investigations through close dialogue with Hareid Elektriske AS regarding the real estate's impact on the environment, mapping of employees' salaries and compliance with the Working Environment Act. Hareid Elektriske AS and the other companies in Hareid Group cooperate closely on guidelines for safeguarding human rights and basic working conditions, transparency etc. and routines and assessments related to these conditions.

The deliveries from Hareid Elektriske AS are considered to have a low risk of negative impact on fundamental human rights and decent working conditions.

3.5.2 Services provided by business partner in Australia

The company has chosen to conduct a due diligence assessment related to the deliveries from its business partner operating in Australia, where, according to the ITUC (International Trade Union Confederation) survey for 2022, there is a high risk of violations of human rights and decent working conditions (systematic violations).

The platform and methodology described in section 3.4.1 has been used in the due diligence assessment.

The following initial risk assessments have been made:

Industry risk:

The assessment of industrial risk is based on the European Bank of Reconstruction and Development's index that links social risk to NACE codes.

The business partner in question is registered with NACE code 62.0 (Programming, consulting and other related activities). The deliveries are considered to have a low risk of negative impact on the environment, low risk of negative impact on social conditions, which results in an overall low industrial risk.

Geographical risk:

Assessment of risk based on the ITUC index of probability of internationally recognised collective labour rights being upheld by governments and employers in different countries. The methodology is rooted in standard fundamental rights in the workplace, in particular the right to freedom of association, the right to collective bargaining and the right to strike.

The deliveries from business partners operating in Australia are considered to have a high risk of negative impact on standard fundamental rights according to the ITUC geographical risk index. The ITUC describes the repeated prosecution by Australian competition authorities of the Construction Forestry Mining and Energy Union, attempts by individual companies to terminate agreements and refuse to renegotiate agreements with the Maritime Union of Australia as examples of restrictions on civil rights and collective bargaining rights.

Social risk:

Assessment of risk built on Ignite score based on quantification and compilation of industrial risk and geographic risk.

The deliveries from business partners operating in Australia are considered to have a medium overall social risk.

Own risk assessment:

In addition to initial assessments of industrial risk, geographical risk and social risk, Hareid Elektriske AS has conducted its own additional risk assessment based on investigations of the specific deliveries and the size of deliveries. The deliveries concern software, which is a delivery that is considered to have a low risk of negative impact on the environment, low risk of negative impact on social conditions. There delivery volume is also very small; NOK 13,390,-. The business partner is not on the ITUC's list of companies that violate or are associated with violations of workers' rights.

Against this background, Hareid Elektriske AS considers the risk associated with deliveries from the aforementioned business partner to be low.

3.5.3 Assessment of the activity in the subsidiary HG Teknikk AS

Hareid Elektriske AS has conducted an overall mapping and due diligence assessment of the activities in the subsidiary HG Teknikk AS. The platform and methodology described in section 3.4.1 has been used in the due diligence assessment.

The following initial risk assessments have been made:

Industry risk:

The assessment of industrial risk is based on the European Bank of Reconstruction and Development's index that links social risk to NACE codes.

HG Teknikk AS is registered with NACE code 30.11 (Interior design and installation work carried out on ships over 100 br. tonnes) This activity is considered to have a medium risk of negative impact on the environment, high risk of negative impact on social conditions, resulting in an overall high industrial risk.

HG Teknikk AS is also registered with NACE code 27.1 (Production of electrical distribution and control panels and panels) This activity is considered to have a medium risk of negative impact on the environment, medium risk of negative impact on social conditions, which gives an overall medium industry risk.

Geographical risk:

Assessment of risk based on the ITUC index of probability of internationally recognised collective labour rights being upheld by governments and employers in different countries. The methodology is rooted in standard fundamental rights in the workplace, in particular the right to freedom of association, the right to collective bargaining and the right to strike.

The activity in HG Teknikk AS is considered to have a low risk of negative impact on standard fundamental rights according to ITUC's index based on geographical risk.

Social risk:

Assessment of risk built on Ignite score based on quantification and compilation of industrial risk and geographic risk.

The activity in HG Teknikk AS is considered to have a medium overall social risk.

Own risk assessment:

In addition to preliminary assessments of industrial risk, geographical risk and social risk, Hareid Elektriske AS has conducted its own additional assessment of the risk of negative consequences HG Teknikk AS's activities may have for basic human rights and decent working conditions.

Hareid Elektriske AS has to a large extent been involved in the due diligence assessments carried out by the subsidiaries during the assessment period, and the parent company is involved in the overall management and control of the subsidiaries.

Hareid Elektriske AS has conducted its own surveys regarding certifications, mapping of employees' salaries and compliance with regulations for working environment and HSE. The companies in the Hareid Group have common guidelines for safeguarding human rights and fundamental working conditions, transparency etc. and routines and assessments related to these conditions

The activity in HG Teknikk AS is considered to have a low risk of negative impact on fundamental human rights and decent working conditions based on own risk assessment.

The company also refers to HG Teknikk AS's report on due diligence, which follows as **Appendix 2** to this report.

3.5.4 Assessment of the Norwegian activity associated with the partly owned subsidiary HG Solutions Sp. Z o.o. NUF

Hareid Elektriske AS has conducted an overall mapping and due diligence assessment of the Norwegian activity in the partly owned subsidiary HG Solutions Sp.z.o.o. The platform and methodology described in section 3.4.1 has been used in the due diligence assessment.

The following initial risk assessments have been made:

Industry risk:

The assessment of industrial risk is based on the European Bank of Reconstruction and Development's index that links social risk to NACE codes.

HG Solutions Sp.z.o.o. NUF is registered with NACE code 43.2 (Electrical installation work). The activity is considered to have a low risk of negative impact on the environment, medium risk of negative impact on social conditions, resulting in an overall medium industrial risk.

Geographical risk:

Assessment of risk based on the ITUC index of probability of internationally recognised collective labour rights being upheld by governments and employers in different countries. The methodology is rooted in standard fundamental rights in the workplace, in particular the right to freedom of association, the right to collective bargaining and the right to strike.

The activity of HG Solutions Sp.z.o.o. NUF was conducted in Norway and is therefore considered to have a low risk of negative impact on standard fundamental rights according to the ITUC index based on geographical risk.

Social risk:

Assessment of risk built on Ignite score based on quantification and compilation of industrial risk and geographic risk.

The activity HG Solutions Sp.z.o.o. NUF is considered to have a medium overall social risk.

Own risk assessment:

In addition to the preliminary assessments of industrial risk, geographical risk and social risk, Hareid Elektriske AS has conducted a separate supplementary assessment of the risk of negative consequences HG Solutions Sp.z.o.o. NUF's activity may have for basic human rights and decent working conditions.

Hareid Elektriske AS has to a large extent been involved in the due diligence assessments carried out by the subsidiaries during the assessment period, and the parent company is involved in the overall management and control of the subsidiaries.

Hareid Elektriske AS has conducted its own surveys regarding certifications, mapping of employees' salaries and compliance with regulations for working environment and HSE. The companies in the Hareid Group have common guidelines for safeguarding human rights and fundamental working conditions, transparency etc. and routines and assessments related to these conditions

The activity of HG Solutions Sp.z.o.o. NUF is considered to have a low risk of negative impact on fundamental human rights and decent working conditions.

The company also refers to HG Solutions Sp.z.o.o. NUF's Due Diligence Report, which follows as **Appendix 3** to this report.

3.5.5 Assessment of the activity in the subsidiary HG Handel AS

Hareid Elektriske AS has conducted an overall mapping and due diligence assessment of the activities in the subsidiary HG Handel AS. The platform and methodology described in section 3.4.1 has been used in the due diligence assessment.

The following initial risk assessments have been made:

Industry risk:

The assessment of industrial risk is based on the European Bank of Reconstruction and Development's index that links social risk to NACE codes.

HG Handel AS is registered with NACE code 47.5 (Retail trade in electrical household appliances) This activity is considered to have a low risk of negative impact on the environment, low risk of negative impact on social conditions, resulting in an overall low industrial risk.

Geographical risk:

Assessment of risk based on the ITUC index of probability of internationally recognised collective labour rights being upheld by governments and employers in different countries. The methodology is rooted in standard fundamental rights in the workplace, in particular the right to freedom of association, the right to collective bargaining and the right to strike.

The activity in HG Handel AS is considered to have a low risk of negative impact on standard fundamental rights according to the ITUC index based on geographical risk.

Social risk:

Assessment of risk built on Ignite score based on quantification and compilation of industrial risk and geographic risk.

The activity in HG Handel AS is considered to have a low overall social risk.

Own risk assessment:

In addition to preliminary assessments of industrial risk, geographical risk and social risk, Hareid Elektriske AS has conducted a separate supplementary assessment of the risk of negative consequences HG Handel AS's activities may have for fundamental human rights and decent working conditions.

Hareid Elektriske AS has to a large extent been involved in the due diligence assessments carried out by the subsidiaries during the assessment period, and the parent company is involved in the overall management and control of the subsidiaries.

Hareid Elektriske AS has conducted its own surveys regarding certifications, mapping of employees' salaries and compliance with regulations for working environment and HSE. The companies in the Hareid Group have common guidelines for safeguarding human rights and fundamental working conditions, transparency etc. and routines and assessments related to these conditions

The activity in HG Handel AS is considered to have a low risk of negative impact on fundamental human rights and decent working conditions.

The company also refers to HG Handel AS's report on due diligence, which follows as **Appendix 4** to this report.

3.6 Conclusion – due diligence assessment

The due diligence assessment has not revealed violations of human rights/decent working conditions or significant risk of human rights/decent working conditions violations in the reporting year.

4. Measures to stop, prevent or limit negative consequences

The company has not uncovered or identified violations of human rights/decent working conditions or significant risk of human rights/decent working conditions violations in the reporting year, and has therefore not implemented its own measures.

Hareid Elektriske AS focuses on follow-up of work and measures initiated by the subsidiaries. The company refers to the disclosures from the individual subsidiaries for further information.

5. Monitoring of measures - implementation and results

We continuously work to monitor the implementation and results of planned measures, and work to further develop routines for monitoring the implementation and results of risk-reducing measures.


6. Communication with affected stakeholders

The company has not uncovered human rights violations or breach of decent working conditions in the reporting year. Nor has the company disclosed a material risk of breach/negative consequences.

7. Recovery and indemnification

The company has not uncovered cases requiring recovery or indemnification during the reporting year.

Hareid, 29.06.2023



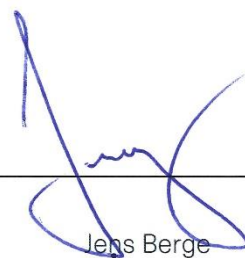
Ingvild Vartdal
Chairman of the Board



Håvard Myrene
Board Member



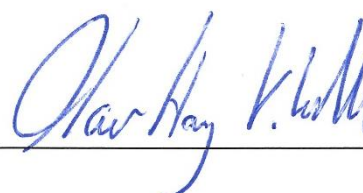
Bjørn Teigene
Board Member



Jens Berge
Board Member



Tor Egil Rise
Board Member



Olav Haug Vikebakk
Board Member

8. Appendices

8.1 Appendix 1

Procedures for anchoring work with the Transparency Act in Hareid Elektriske AS

1. Introduction

The purpose of the Transparency Act is to promote companies' respect for fundamental human rights and decent working conditions in connection with production of goods and provision of services.

In addition, the Transparency Act is intended to ensure public access to information about how businesses deal with negative consequences for fundamental human rights and decent working conditions.

This procedure describes how Hareid Elektriske AS anchors and works with due diligence in line with the provisions of the Transparency Act.

2. Anchoring

The Board of Directors determines Hareid Elektriske AS's routines for the work to be performed and the allocation of responsibility for the work to be carried out to meet the requirements of the Transparency Act.

3. Board review and audit

The Board of Directors of Hareid Elektriske AS shall review the company's procedures regularly. The managing director plans for this and presents the routines and any changes to these to the board.

The managing director shall once a year review the work carried out by Hareid Elektriske AS, findings made, measures implemented, etc. The annual review is a matter of briefing for the board.

The managing director shall assess whether there is a need for the board's involvement in matters related to the Transparency Act beyond the annual review.

4. Annual reporting

The Board of Directors approves the annual report on Hareid Elektriske AS 's due diligence assessments and the results thereof, including their publication. The deadline for publication is at the same time as the company's annual report or no later than 30 June each year.

5. Due diligence

Hareid Elektriske AS shall annually conduct due diligence related to our activities. This means that we must carry out investigations that are reasonable and relevant if we are to uncover possible consequences of or risks of violations of fundamental human rights or decent working conditions.

Due diligence must be carried out for our own activity, our suppliers' activities and our business partners' activities.

Due diligence must be carried out for all of our products and services.

6. Possible actions

Findings through due diligence shall lead to an assessment of measures that may be relevant to implement. The measures shall be suited to prevent actual violations of fundamental human rights or decent working conditions, or to reduce the risk of such violations taking place.

The effect of the measures will be evaluated.

7. Whistleblowing channels

Hareid Elektriske AS will establish a system for reporting violations of fundamental human rights and decent working conditions. The system shall give its own employees, suppliers and business partners' employees and the general public the opportunity to report incidents.

8. Information and training

Hareid Elektriske AS shall ensure that information about our work in accordance with the Transparency Act is available to its own employees, suppliers and business partners' employees and the general public. The information must be adapted to external stakeholders and own employees.

Hareid Elektriske AS shall regularly train its own employees in the Transparency Act and the company's routines and work in accordance with the law. Participation must be documented.

Hareid, 29.06.2023



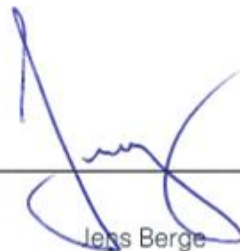
Ingvild Vartdal
Chairman of the Board



Håvard Myrene
Board Member



Bjørn Teigene
Board Member



Jess Berge
Board Member



Tor Egil Rise
Board Member



Olav Haug Vikebakk
Board Member

8.2 Appendix 2

Report for HG Teknikk AS

The report for HG Teknikk AS is found at the group's webpage:

<https://www.hareidgroup.com/about-us/sustainability>

8.3 Appendix 3

Report for HG Solutions Sp. Z o.o. NUF

The report for HG Solutions Sp. Z o.o. NUF is found at the group's webpage:

<https://www.hareidgroup.com/about-us/sustainability>

8.4 Appendix 4

Report for HG Handel AS

The report for HG Handel AS is found at the group's webpage:

<https://www.hareidgroup.com/about-us/sustainability>