



Let's go further



Norwegian Transparency Act Statement

June 2024

EG Norge AS

EG Retail AS

Holte AS

Ørn Software AS



NORWEGIAN TRANSPARENCY ACT STATEMENT

EG Norge AS - Business registration number 983 781 233

EG Retail AS – Business registration number 968 992 600

Holte AS – Business registration number 982 506 395

Ørn Software AS - Business registration number 979 443 471

("The Companies")

January 1, 2023, to December 31, 2023

Published June 2024 – English version.

Background

As a larger enterprise resident in Norway the Transparency Act (Lov om virksomheters åpenhet og arbeid med grunnleggende menneskerettigheter og anstendige arbeidsforhold) is applicable to The Companies.

The Companies complies with the act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (Transparency Act), which shall promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure the public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions.

This document has been prepared to fulfill the Companies obligation to report the due diligence assessments for the period January 1, 2023, to December 31, 2023. The period corresponds to The Companies last financial year.

The document will be updated and published annually by June 30. It will also be updated in the event of significant changes in The Companies risk assessments in accordance with the Transparency Act.

General description of the company structure in EG Norge AS

EG Norge AS is fully owned by EG Danmark A/S.

CEO: Erik Tomren and Lars Jørgensen

Chairperson of the board: Henrik Hansen

EG Norge AS has as of December 31, 2023, 201 employees.

Area of operations in EG Norge AS

EG Norge AS's business area is related to the development and sale of standard software to selected industries in Norway. EG Norge AS's headquarter is located in Oslo with local offices in Gjøvik, Trondheim, Asker, Haugesund, Sandnes, Bergen, Harstad, Drammen, Molde, Tønsberg and Sandefjord.

General description of the company structure in EG Retail AS

EG Retail AS is fully owned by EG Norge AS.

CEO: Erik Tomren and Mathias Gadegaard Andersen

Chairperson of the board: Henrik Hansen

EG Retail AS has as of December 31, 2023, 77 employees.

Area of operations in EG Retail AS

EG Retail AS offers a comprehensive solution portfolio developed together with the market's largest and managed retail sector in the Nordics within the industry, trade, sports, grocery, and service trade. EG Retail AS has offices in Trondheim, Oslo, and Bergen.

General description of the company structure in Holte AS

Holte AS is fully owned by EG Danmark A/S.

CEO: Magne Solberg and Vidar André Løken

Chairperson of the board: Michael Moyell Juul

Holte AS has as of December 31, 2023, 107 employees.

Area of operations in Holte AS

Holte AS's business area is related to the development and sale of standard software for project management and services to the primary building, construction, and real estate industry in Norway. Holte AS's headquarter is located in Oslo with local offices in Tønsberg and Trondheim.

A general description of the company structure in Ørn software AS

Ørn Software AS is fully owned by EG Norge AS.

CEO: Kristin Berg and Vidar André Løken

Chairperson of the board: Michael Moyell Juul

Ørn Software AS has as of December 31, 2023, 100 employees.

Area of operations in Ørn Software AS

Ørn Software AS's business area is related to providing a digital platform that simplifies day-to-day operations for demanding businesses in the Nordics Iceland. The Software as a Service-solutions ensure efficient operations and maintenance throughout a wide variety of industries. The company's headquarter is located in Oslo with local offices in Trondheim, Moss, Tromsø, Florø, Tønsberg, Hamar and Bergen.

Guidelines and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions

The Companies wants to be honest, trusted, and accountable software companies, aiming to make a positive contribution to the general development of modern society. All our products and operations shall comply with international human rights standards and standards for decent working conditions.

As part of the EG Group we commit ourselves to the UN Global Compact and our business complies with the UN Guiding Principles on Responsible Business and Human Rights and the OECD Guidelines for Responsible Business Conduct. Our overall approach to fulfilling our commitment to respecting fundamental human rights and decent working conditions is guided by our policies, which includes both our own operations and our supply chain.

Read more about our policies [here](#).

The Companies are compliant with the national legislation for health, safety, work environment and diversity. We expect our suppliers and business partners to support the Universal Declaration of Human Rights and Labor Rights and respect these rights within their sphere of influence and operate their business in a transparent and trustworthy way.

We expect the same of our suppliers and business partners as we expect from our selves. All employees and others affected by our businesses are treated with respect and dignity.

We expect our suppliers and business partners to act with seriousness and care to avoid injuries and negative consequences for people. The suppliers and business partners must ensure equal rights and opportunities for its employees and the suppliers and business partners must not discriminate e.g., based on race, ethnicity, gender, age, marital status, religion, political affiliation, union membership or sexual orientation.

We expect our suppliers and business partners to have an appropriate set of rules, practices, and processes in place to ensure accuracy, consistency, and responsiveness to key stakeholders including customers, shareholders, and regulators.

ESG in EG and The Companies

The EG ESG Committee sets the targets and prioritizes the ESG activities in EG and all subsidiaries, including The Companies.

The EG ESG Committee is a cross-functional senior management committee, chaired by the CEO for EG A/S. In 2023 the Committee regularly evaluated the EG ESG activities, based on changes to relevant laws, regulatory guidance and best practice and it has been looking into new ESG activities and initiatives in EG and the subsidiaries for 2023.

The EG ESG Committee reports on initiatives, progress, and the material ESG topics to EG's Board of Directors.

Information regarding actual adverse impacts and significant risks of adverse impacts that has been identified through the due diligence

In line with the Transparency Act, we conduct a due diligence of our own operations and supply chain, and we report annually publicly on our due diligence assessments. We respond to requests on how we work to ensure respect for human rights and decent working conditions in the production of our products.

In this year's disclosure, we have conducted a risk analysis based on all suppliers and business partners we did business with during the period January 1, 2023, to December 31, 2023. We have also explored how our suppliers and business partners identify and mitigate risks in their own supply chains to that extent that it was possible.

No human rights violations or bad working conditions were revealed through the supplier and business partner survey and due diligence.

As all our suppliers and business partners are based in the Nordics, Europe and US, we assess that the risk for adverse impacts in terms of child labor most likely to be low.

We are aware of the risks that are inherent in our area of operations such as non-equality and discrimination, but no violations were detected.

Additionally, we are aware of risks of human rights breaches connected to the supply chains of IT-products, regarding raw material, components, and assembly.

In the reporting period, no actual negative consequences were identified.

The Companies operations

Our risk assessment in our own operations has revealed that the most critical potential consequences could be:

- stress,
- bullying,
- sexual harassment,
- fire, the indoor environment such as air quality, light, temperature, and noise,
- strain ailments like back, neck, shoulder, and neck pains,
- eye fatigue and headache due to screen work.

Information regarding measures that has been implemented or plans to implement to cease actual adverse impacts or mitigate significant risks of adverse impacts, and the results or expected results of these measures the Companies operations

We work systematically in cooperation with employees to prevent injuries from occurring, through our HSE routines. All deviations are followed up.

Suppliers and business partners

We aim by performing due diligence of our suppliers and business partners to influence our suppliers and business partners to provide their workers and workers in their supply chain decent employment conditions according to the expectations set in the Transparency Act.

If violations of human rights and or other fundamental standards at a supplier, business partners or subcontractor are discovered, or significant risk of such violations, we follow up through dialogue with the relevant supplier, business partner or/and relevant stakeholders.

Whistleblower scheme

The Companies has effective routines for ensuring compliance and knowledge of human rights and sustainability among our employees. We have a whistleblower scheme where employees and others can report breaches of our Code of Conduct, report violations of fundamental human rights, decent working conditions or other censurable conditions. At the same time, continuous learning, and improvement in the organization is facilitated through training materials and awareness training.

Next step

The Companies will continue its efforts in 2024 by working actively with the Transparency Act. We will continuously review our suppliers and business partners with focus on fundamental human rights and decent working conditions and perform risk assessments. We will also continue to evaluate how our suppliers and business partners are working with identifying and mitigating risks in their own supply chains.

(Signature page for the Norwegian Transparency Act Statement by EG Norge AS)

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Henrik Hansen

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Henrik Hansen

Chairperson of the Board

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Erik Tomren

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Director

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Chief Executive Officer

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Lars Jørgensen

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Lars Jørgensen

Chief Executive Officer

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Mathias G Andersen

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Chief Executive Officer

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Michael Moyell Juul

Chairperson of the Board

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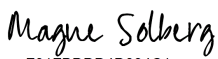


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Henrik Hansen

Director

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Chief Executive Officer

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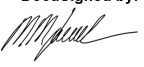


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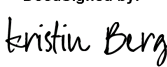
Vidar André Løken

Chief Executive Officer


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Michael Moyell Juul
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Vidar André Løken
Chief Executive Officer