

Transparency Act 2023–2024

Account for due diligence assessment

1. INTRODUCTION

Designer Group Norway AS ("Designer Group Norway ") complies with the Act on Corporate Transparency and Work with Fundamental Human Rights and Decent Working Conditions (the "Transparency Act "). The Transparency Act aims to promote companies' respect for fundamental human rights and decent working conditions and ensure public access to information.

Companies covered by the Transparency Act are obliged to carry out due diligence in line with the OECD Guidelines for Multinational Enterprises in order to identify, prevent, account for and follow up on how the company manages actual and potential negative impacts on fundamental human rights and decent work in its own operations, towards business partners and in the company's supply chain.

We are committed to conducting our business according to socially responsible and ethical principles. We strive to be a responsible buyer and supplier, and conduct regular due diligence to uncover any negative impacts on fundamental human rights and decent labour conditions related to our operations, business partners or our supply chain.

This report mainly covers the period 1 April 2023 to 31 March 2024, but also includes changes to our internal guidelines and processes implemented in second quarter of 2024.

2. KEY INFORMATION ABOUT THE BUSINESS

2.1 Name of the company

Designer Group Norway, org. no. 924 494 328.

2.2 Products, services and market

The principal activities of Designer Group Norway are the design and installation of mechanical and electrical systems and the provision of engineering services.

2.3 The organization of the business

Designer Group Norway was established in Norway in 2020 and is a wholly owned subsidiary of Designer Group Engineering Contractors Ltd.

Designer Group Norway has [1] employees, supported by Ireland/UK operations which has circa 1200 direct/indirect employees.

Designer Group Norway's day to day operations is managed by Catriona Gallagher, in close cooperation with the company's Board of directors Michael Stone, Tim Kenny, Paul O'Donnell & Paul Nicholls.

2.4 Responsible for the due diligence in Designer Group Norway and this report

Designer Group Norway's Board of directors has overall responsibility for the due diligence carried out by Designer Group Norway and for compliance with obligations under the Transparency Act.

Paul O'Donnell is responsible for the practical implementation and follow-up of the Transparency Act.

2.5 Our policies and procedures for managing risks related to human rights and decent working conditions

Our efforts to act as a responsible business and mitigate negative impacts on fundamental human rights and decent work are an integral part of the business. Designer Group Norway acknowledges that

Transparency Act 2023–2024

Account for due diligence assessment

we must set a clear tone from the top and responsibility for the necessary tasks must be clearly allocated internally. In addition, we must firmly communicate our expectations to our suppliers and business partners and demand that they act responsibly according to our expectations.

Our main routine in respect of the Transparency Act is our internal procedure for fulfilment of obligations under the Transparency Act, which sets out the required tasks and how responsibility is to be allocated internally.

In addition, we have a set of other key policies and procedures to support our work under the Transparency Act, hereunder:

- Procurement procedure
- Supplier code of conduct
- Grievance Policy and Procedure
- Anti Bullying & Harassment Policy & Procedure
- Whistle blowing policy

Designer Group Norway uses a risk matrix for mapping the risks associated with suppliers and business partners. Based on factors such as risks associated with countries, industry-related risks and risks related to the product categories involved, a risk profile is created for each individual supplier or business partner. The risk matrix is updated on an ongoing basis and, based on this, it is continually assessed which issues should be prioritised for further follow-up.

Designer Group Norway operates on a 3-quote procedure for all major packages of work. The successful candidate needs to demonstrate an ability to work compliantly, safely and to the relevant quality standards.

There is a 'Request to Procure' procedure which is also followed to ensure that relevant checks can be carried out.

Potential new suppliers or business partners are set up by our Finance department, with relevant financial, quality and compliance checks carried out before the supplier or business partner is approved. No purchase orders can be issued before the supplier/business partner is set up in accordance with this.

Designer Group Norway also has a risk matrix for assessing the risk of its own operations.

We continuously consider the need to improve, update and develop our policies and procedures.

3 IDENTIFIED NEGATIVE CONSEQUENCES

3.1 General information

According to the Transparency Act, identified actual negative consequences for fundamental human rights and decent working conditions, as well as significant risk of such negative consequences, must be reported. When assessing what is considered a significant risk, consideration must be given to how serious the consequences are or will be for those affected, and the likelihood of negative impact.

3.2 Identified negative consequences to fundamental human rights or decent working conditions

Through our risk mapping, we have not identified any actual negative consequences in our own operations, hereunder in relation to downstream activities.

Transparency Act 2023–2024

Account for due diligence assessment

Further, we have so far not identified any actual negative consequences related to any of our suppliers or business partners.

However, we have identified potential negative consequences, mainly in relation to the following two areas:

- 1) **Construction work:** It is commonly recognized that the Norwegian construction industry (as many other countries) has particular risks regarding working conditions. This pertains both to issues such as working hours and minimum wage compliance, and the lack of proper safety procedures towards physical injuries.
- 2) **Products with international value chain:** There is in general a complex global value chain behind several of the products we source from our suppliers and business partners, hereunder electronic components. We currently do not have detailed insight into the value chain behind our suppliers / business partners, and do not have any particular indications that there are any human rights or working condition issues associated with these. However, we acknowledge that there is a general significant risk in these global value chains, hereunder in respect of working hours compliance, minimum wage compliance, child labour, and potentially unsafe working conditions.

4 MEASURES TO STOP OR LIMIT RISK – GENERAL INFORMATION

Designer Group operates on a 3-quote procedure for all major packages of work. The successful candidate needs to demonstrate an ability to work compliantly, safely and to the relevant quality standards.

Negative impacts on fundamental human rights and decent working conditions shall be addressed through the implementation of appropriate measures to halt, prevent or mitigate negative impacts based on the priorities and assessments made during the mapping phase.

When assessing which measures to implement, we consider our connection to the negative consequences and our ability to influence them. If we ourselves cause a negative consequence, the activity must be stopped. The same applies as a starting point if we contribute to a negative consequence, but if it is not possible to stop the activity completely, we must try limiting the consequence, taking into account how much influence we are able to exert over the supplier or business partner to which the activity is linked.

To mitigate the risk related to construction work as mentioned under section 3 above, Designer Group Norway has a strict procedure to ensure that we do not engage any suppliers for construction works before we are satisfied that they live up to all required standards in terms of respect of fundamental human rights and basic working conditions. In addition, we will continuously assess the need for further enquiries and/or measures towards our suppliers and business partners in this area.

When it comes to products we source that have a global supply chain, we generally do not have practical possibility to gain insight into or directly influence the conditions in the various parts of the supply chain behind our suppliers and business partners. However, we assess the risk profile of each of our significant suppliers and business partners and will follow up with further enquiries and/or measures towards them directly where we see the need.

If we uncover violations of our supplier code of conduct or relevant legislation, this will be followed up in dialogue with the relevant supplier / business partner. Failure to co-operate and/or repeated breaches

Transparency Act 2023–2024

4 of 5

Account for due diligence assessment

or deviations from our supplier code of conduct and/or national legislation may lead to termination of the agreement a supplier or business partner has with us.

5 CONTACT US

For questions about this statement or how we work to respect fundamental human rights and decent working conditions, please contact us by sending an email to:

TransparencyActNorway@designergrp.com

Transparency Act 2023–2024

Account for due diligence assessment

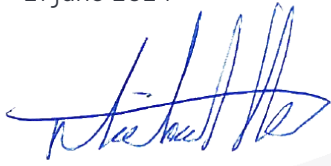
5 of 5

Signature page for report pursuant to the Transparency Act for Designer Group Norway AS

On behalf of Designer Group Norway AS

Board of Directors:

21 June 2024



Michael Charles Stone

Chairman



Timothy William Kenny

Board member



Paul O'Donnell

Board member



Paul Nicholls

Board member