

STATEMENT AGAINST SLAVERY AND HUMAN TRAFFICKING

The Norsk Gjenvinning Group (“The NG Group”) has committed to contribute to sustainable development, including responsible business practices and compliance. It is our belief that this is a prerequisite for long term value creation. Hence, the NG Group has zero tolerance for slavery and human trafficking amongst our directly employed workforce, or any employees in our supply chain.

The NG Group is Norway’s leading provider of waste and recycling services. The group operates through wholly and partly owned companies. Norsk Gjenvinning Norge AS is the parent company of the group. The group has operations in Norway, Sweden, Denmark and the UK and is headquartered in Lysaker outside Oslo. The operations are organized into four divisions in addition to four focused niche companies offering services related to environmentally friendly waste management and raw material extraction throughout the value chain.

The NG Groups supply chains may, on a general level, be divided into three categories:

- **Waste collection and reception upstream**
Upstream clients and business partners are generally not exposed to slavery or human trafficking. Considered low risk.
- **Sales of raw materials downstream**
Raw materials are sold to industrial businesses in Scandinavia, Europe and Asia. Clients and business partners may be exposed to slavery or human trafficking at production sites, mainly outside the Nordic countries. Considered medium-high risk.
- **Procurement of goods and services**
Main categories of goods and services are maintenance, rental of equipment and machinery, hire of personnel and fuel. We use Scandinavian suppliers for all procurement, except for procurement of steel wire purchased from a supplier in the Baltics. This is a well-known supplier. We consider the risk of slavery and human trafficking amongst our direct suppliers to be very low. Although we do not have full insight to the entire supply chain of our suppliers the risk of slavery and human trafficking are considered low, based on the kind of products they deliver to the NG Group.

Actions related to slavery and human trafficking is aimed mainly at our activities downstream, where the risk is considered to be higher. The NG Group has taken a variety of actions to verify the absence of forced labor, slavery, and human trafficking in our supply chains, including:

1. **VERIFICATION AND RISK ASSESSMENT:** Internal assessment of supply chain risk based on international indices, supplier performance (e.g. audits), and other indicators of supplier-specific risks. This risk assessment is conducted annually, and incorporates risk factors including human rights risk and country governance and accountability.
2. **PRE-QUALIFICATION OF SUPPLIERS:** Mandatory pre-qualification of all business partners, including suppliers, outside the Nordic countries. The pre-qualification process requires our supply chain to demonstrate the steps taken to ensure conformance with international laws and regulations and the UN Global compact principles (health and safety, child labour, discrimination, working hours, living wage). Additional independent, third-party Integrity Due Diligence (“IDD”) checks are carried out if inherent risks are considered high. The information obtained during this process is vetted by a primary and secondary approver. The secondary approver is a senior manager and is ultimately responsible for deciding whether or not the company is appropriate to be a business partner of the NG Group.

3. **AUDITS:** On-site verification of conformance with e.g. international environmental laws and regulations, contractual terms and the UN Global compact principles (health and safety, child labour, discrimination, working hours, living wage). On-site verifications include audits of raw material business partners in Asia and European carriers. We select supplier sites for audit based on the verification and risk assessment described above.
4. **CONSEQUENCES OF VIOLATING REQUIREMENTS:** Strict policy and strict contractual clauses on termination of the business relationship if it is revealed violations of requirements, including business partner's involvement in modern slavery and human trafficking.

The NG Group maintains corporate-wide accountability and grievance mechanisms (e.g., the NG whistle-blowing function), which are available to both employees and external parties.

5. **TRAINING:** To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have integrated these topics in our overall training of relevant members of staff. Based on our risk assessment training is particularly relevant for staff working with pre-qualifications of new business partners downstream and staff participating in audits outside the Nordic countries.

Each division and niche company in the NG Group have responsibility for implementing and monitoring compliance to all of the supply chain activities described above. The compliance function and the legal department ensures that the required actions are carried out, and supports divisions and niche companies with contractual terms, interpretation of laws and regulations, audits and risk assessments.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015.

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