

Høglund Procedure in relation to the Transparency Act

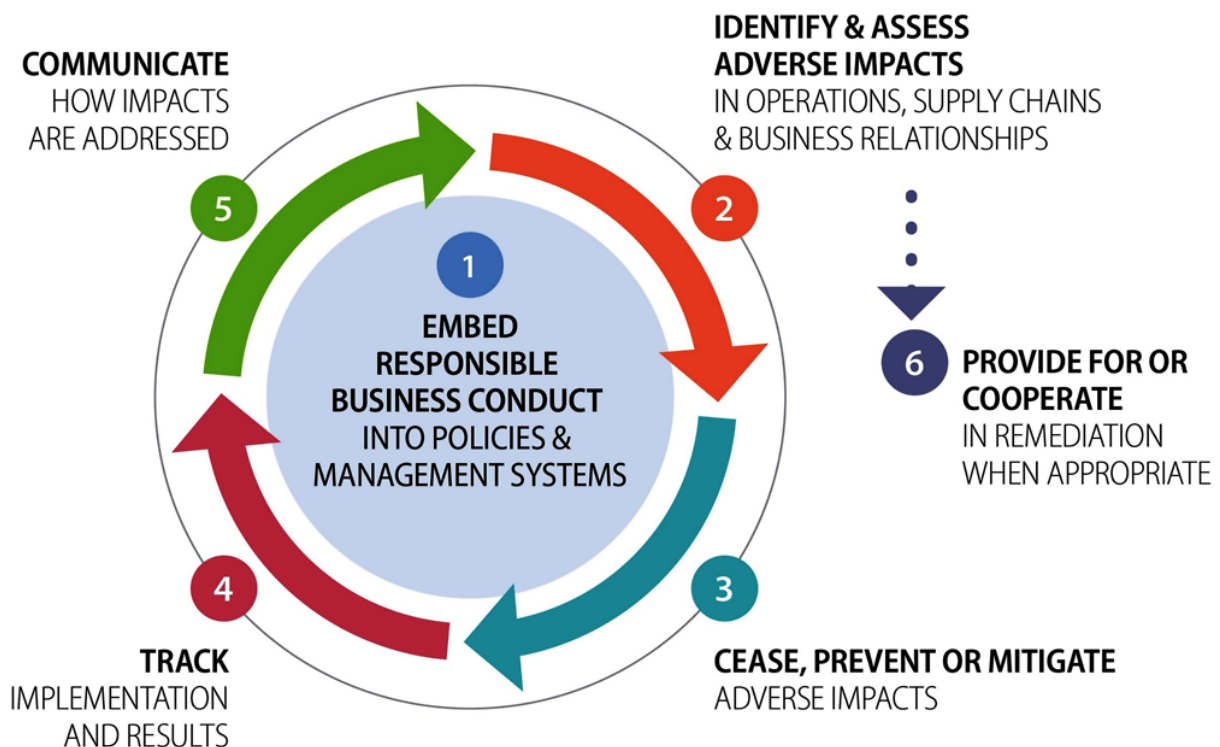
The Transparency Act, section 1, states: “The Act shall promote enterprises’ respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure the general public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions.”

Høglund AS (“Høglund”) is an ISO9001:2015 certified company, working hard to achieve the objectives defined in the Act. Our “Code of Conduct” as well as our Quality Policy and the ESG goals published on our webpage, both support this statement.

In relation to the Transparency Act, Høglund shall:

1. carry out Due Diligence of existing and new suppliers and business relations
2. store an account of the respective Due Diligence Assessments
3. provide information to the Public on request

Due Diligence is done according to the OECD Guidance for Responsible Business Conduct:



1. Due Diligence of existing and new accounts

Under Due Diligence assessment, Høglund shall investigate whether there are any actual risks of adverse impact on human rights or decent working conditions in our own operations, our supply chain and other business relations. Severity and probability are assessed, and measures taken to mitigate.

a) Procedure Own Operations:

Høglund conducts monthly Business Continuity Risk Assessment meetings in the Management Team, where risks (including those in relations to the Transparency Act) are addressed and handled according to the severity and impact. The meetings are led by Høglund's HSEQ Manager.

b) Procedure Supply Chain and Business Partners:

All new suppliers and business partners are assessed before a business relation is entered. We perform Due Diligence of all potential connections, and in addition, they are provided our Code of Conduct document, which they are obliged to concur to.

Further, a questionnaire with relevant questions related to the human rights and working conditions is sent out to all new business connections.

The questionnaire is sent out once per year to 10 of the largest accounts in Høglund.

2. Storage of the assessment documentation

The filled-out Due Diligence questionnaires are stored in own database on company intranet- SharePoint page. Additional documents are stored in the same folder.

3. Information to the Public

On request, the stored Due Diligence information is provided to the Public. In addition, all information outlined in this document will be published on our webpage.

To require information, the Public can contact Høglund by email: mail@hoglund.no