### Transparency Act – Due Diligence Assessment

### Introduction

This due diligence assessment is made available to the public to meet requirements in the Transparency Act. In the following you will find the required information that the law requires companies to make publicly available:

- a) Multiconsult's structure, business areas, governing documents for handling potential adverse impacts on human rights and working conditions
- b) Information about potential adverse impacts and significant risks that Multiconsult has identified through our due diligence
- c) Information about Multiconsult's measures in operation and what we plan to implement, with some assumptions about expected results of these new measures

#### a) Multiconsult's structure, business areas and governing documents

Multiconsult publishes yearly an <u>annual report</u>. The latest in March 2023. The annual report is a comprehensive overview of Multiconsult's financial and operational performance for the last reporting year. In addition to a financial statement and highlights it also provides a comprehensive overview of Multiconsult's business, our risk factors, corporate governance, and sustainability. The chapters that describe our business, corporate governance and sustainability meet the requirements in the Transparency Act with respect to structure, business areas and listing of governing documents for ensuring non-violation of human's rights and the rights of workers.

For more detailed information about Multiconsult's reporting structure and business areas, then please see page 11 in the annual report under chapter Reporting Structure and business areas. For an even more in-depth description of the structure and business areas, please see page 128 and Note 5 – Segments in the annual report. In the above links you will find information about:

- How Multiconsult is organised
- What types of services and products Multiconsult delivers to the markets where we operate
- And to which industries we deliver those services and products

## How governing documents ensures compliance in our operations with respect to laws and regulations

In the *Sustainability and Corporate Responsibility* part of the <u>Annual report</u>, page 50, we have included information about our governing documents and what areas they regulate internally. The governing documents require and regulate among other, human rights and employees working conditions.

On page 76 in the Annual report, Multiconsult has elaborated on how human rights and workers conditions are governed and incorporated in our operations. Equal opportunities are described on page 76. Health, safety and working environment on page 75. The right to assembly and unionise on page 78. Participation in workplace decision-making page 74, collective bargaining page 76 and fair wages and benefits page 80 and 81.

When it comes to mechanisms for reporting issues of concern for employees, suppliers, subcontractors and other stakeholders, Multiconsult has several in place. The mechanisms are well described on pages 75, 84 and 85.

# b) Adverse impacts and significant risks that Multiconsult has identified through our due diligence

Multiconsult is a multinational company with projects running in more than 30 countries throughout the world at any given time. To deliver our services and products we are dependent on a wide range of suppliers and subcontractors. Including, but not limited to, subcontractors who deliver input to the services we in turn deliver to our clients, and suppliers of transportation and hospitality in the areas our assignments are located.

In our due diligence we have focused on our own value chain and key suppliers and subcontractors. On a high level, Multiconsult has over the years been developing our value chain, suppliers and subcontractors that meet a set of criteria are required to adopt our Business Partner Declaration, ensuring that they follow our Code of Conduct.

New international suppliers and subcontractors are all scrutinized through a business ethics risk assessment and screened with respect to adverse media (integrity due diligence) before an agreement is signed.

The due diligence process conducted with respect to the transparency act has verified the existing approach that has been in place the last decade. Our international business - especially assignments delivered in Asian, African, and South American countries - expose Multiconsult to potential violations of human rights and employees working conditions. The exposure is linked to the transportation and hospitality services that our employees and subcontractors are requiring to deliver our project management and engineering services. Further, there are subcontractors and suppliers in Asian, African, and South American countries that might have activities where violation of human rights and employees working conditions do occur.

Multiconsult's processes for training our employees, and requirements outlined to our suppliers and subcontractors have been in operation for more than a decade. Our employees known well what is expected of them, and should any violations occur, reporting is mandatory according to our policy. Likewise, a high percentage of suppliers and subcontractors in Asian and African countries being used in our operations are partners that we have been working with for several years. They are all in our monitoring system (system for conducting IDDs), and internal audits of our assignments do from time to time include audits of the supplier and/or subcontractor.

In the internal audit of Norplan Tanzania conducted autumn 2022, a partly owned company of Multiconsult and an often-used subcontractor, the focus of the audit was on business ethics and health and safety. The audit identified areas for improvement, especially connected to fire safety in the offices where employees were conducting their work.

# c) Multiconsult's measures in operation and what we plan to implement, with some assumptions about expected results of these new measures

Multiconsult has several measures in place to avoid violating human rights and workers' rights. On a high level these are:

Governing documents: Multiconsult has policies, procedures and guidance, like Multiconsult's code of conduct, and health and safety policy that explicitly prohibit human rights abuses and worker exploitation and establish clear expectations for our employees. We have further requirements in contract where we explicitly require that business partners to uphold equal requirements in their operation.

Monitoring and audits: Multiconsult monitors its operation and conducts risk-based audits that among other have focus on human rights, work conditions etc. to identify and assess potential risks to human rights and workers' rights in our operations and supply chains.

Barriers/risk reducing measures/controls: Multiconsult assess its operations, and where we identify unwanted level of risk, we ensure that barriers/risk reducing measures/controls are in place, and working as intended, to avoid unwanted incidents. Where barriers/risk reducing measures or controls are not working as intended or non-existent, actions are taken to address those issues.

Grievance Mechanisms: Multiconsult has several mechanisms for workers and communities to raise complaints or grievances related to human rights abuses or violations of workers' rights. These mechanisms are transparent and accessible and ensures that complaints are investigated and addressed appropriately. For external or internal stakeholders <a href="Multiconsult's Whistleblower">Multiconsult's Whistleblower</a> portal is one of several grievance mechanisms.

Collaborative Efforts: Multiconsult work together with industry NGO's like RIF (Norway), and unions like TEKNA and NITO to promote respect for human rights and workers' rights in their operations and supply chains. Collaborative efforts are best practices, participating in multi-stakeholder initiatives, and engaging in dialogue.

Transparency and Reporting: Multiconsult demonstrates transparency by publicly reporting on our human rights and workers' rights practices, including the steps they are taking to address identified risks and any incidents of potential violations.

### The board and CEO of Multiconsult ASA

Oslo, 15 June 2023

Rikard Appelgren

Chair of the board

Tove Raanes

Director

Sverre Hurum

Director

Torben Wedervang

Director

Grethe Bergly

CEO

Hanne Rønneberg

Director

Tore Sjursen

Director

**Gunnar Vatnar** 

Director

Karine Gierse

Director