

## **Transparency and Legal Compliance Policy**

### **1. Introduction**

Avinto is committed to upholding the highest standards of transparency and compliance in all aspects of our operations. This policy aligns with the Norwegian Transparency Act 2022, reflecting our responsibility to respect fundamental human rights and promote decent working conditions. At Avinto, we undertake regular due diligence assessments to address risks and ensure ethical practices across our supply chain.

### **2. Legal Frameworks and Obligations**

The Norwegian Transparency Act 2022 requires companies to conduct due diligence assessments to identify, prevent, and mitigate risks related to human rights violations and unacceptable working conditions. Avinto is legally obligated to:

- Identify and assess actual and potential adverse impacts on our supply chain
- Implement measures to address identified risks effectively
- Monitor and evaluate the effectiveness of these measures
- Publicly disclose relevant information about our due diligence processes through regular reports

### **3. Purpose of the Policy**

In accordance with the Transparency Act, this policy aims to:

- Promote respect for fundamental human rights and decent working conditions in the production of goods and provision of services
- Ensure public access to information regarding how we address actual and potential adverse impacts on human rights and working conditions
- Embed responsible business conduct into all our operations and partnerships

## **4. Governance and Oversight**

The management team at Avinto is responsible for ensuring compliance with the Transparency Act. Operational oversight, including due diligence assessments and stakeholder reporting, is managed by designated teams within the organisation.

## **5. Due Diligence and Risk Assessments**

At Avinto, we conduct thorough due diligence to identify and assess risks related to adverse impacts on human rights and working conditions within our supply chain and operations. We prioritize actions based on the severity and likelihood of these risks, implementing and continuously monitoring measures to mitigate or eliminate any identified risks.

## **6. Stakeholder Engagement**

At Avinto, we actively communicate with stakeholders to ensure transparency regarding our efforts to address identified risks. We provide clear and accessible reporting, allowing stakeholders to monitor our progress.

## **7. Regular Public Reporting**

Avinto publishes an annual report detailing:

- Our organizational structure, operational areas, and policies for managing risks
- Actual and potential adverse impacts identified during risk assessments
- Measures implemented to address these impacts and their outcomes

## **8. Compliance with Human Rights Standards**

Avinto is dedicated to upholding human rights, dignity, and fairness, as reflected in our Code of Conduct, values, policies, and processes, including our employment practices,

non-discrimination policies, and health and safety policies. Further, Avinto exhibits compliance with all local laws and regulations regarding human rights in every location where we operate.

As best practice for identifying and addressing human rights risks and impacts, we align our values and practices with the Universal Declaration of Human Rights, the UN Convention on Economic, Social, and Cultural Rights, the UN Convention on Civil and Political Rights, the UN Convention on the Rights of the Child, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

## **9. Right to Information**

At Avinto, we recognize the public's right to request information about how we address adverse impacts on human rights and working conditions.

- Requests can be made in writing and will be responded to within a maximum of two months.
- Denied requests will include a clear justification, and stakeholders may appeal through the relevant supervisory bodies

## **10. Investigation and Action**

A confidential whistleblowing channel is available for reporting violations. In the event of a complaint, Avinto will conduct a thorough and timely investigation. Reports are handled with strict confidentiality, and retaliation against whistleblowers is not tolerated. If the claim of violation is substantiated, Avinto will take appropriate corrective action.