



KOMPLETT ASA – TRANSPARENCY ACT ACCOUNT

INTRODUCTION

Komplett ASA (“Komplett Group”) is committed to the protection of internationally recognised human rights and fair and ethical work practices. The company complies with all applicable laws and regulations, including the Norwegian Transparency Act.

The Transparency 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 public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions.

The act imposes three main obligations on companies: a duty to carry out due diligence in accordance with the guidelines from OECD, a duty to account for due diligence and a duty to answer information requests.

About the account

This account has been prepared in accordance with the Transparency Act. It summarises Komplett Group’s governance, policies, and procedures regarding the protection of human rights and decent working conditions, as well as risk identified in the due diligence assessment and measures to mitigate these risks.

Komplett Group and four subsidiaries are covered by the act’s obligations: Komplett Services AS, Komplett Distribusjon AS, Ironstone AS and NetOnNet AB. Webhallen AB is not affected by the act directly, but as all activities in Komplett Group are to be assessed,

they are included in the group due diligence assessments.

Accounts of the due diligence carried out by the subsidiaries are to be found in the appendix.

ABOUT KOMPLETT GROUP

Komplett Group is the largest online first electronics retailer in the Nordic area and offers its customers one of the market’s broadest selections of consumer electronics and business solutions. The group operates an efficient and scalable business model and is widely recognised for having an industry leading cost position.

The group is serving customers in the B2C, B2B and distribution segments. Komplett Group’s operations in the B2C segment cover sales to private consumers across Norway, Sweden and Denmark through the brands Komplett, NetOnNet and Webhallen. The customers are served from ten webshops, 17 physical stores and 30 complementary self-service, logistics and warehouse shops.

Komplett B2B is an online player market for corporate customers in the Nordics focusing on the small and medium sized enterprises and small office and home office segments. Komplett B2B offers its customers a fully digital customer journey through its web shops Komplettbedrift.no and Komplettforetag.se and serving the Norwegian and Swedish market, respectively.

The group’s activities in the distribution segment consist of large-scale distribution contracts for sale to resellers and other big

entities not covered by B2B, which are operated under the Itegra brand and its own platform. With its flexible logistics and delivery platform, the group is at the forefront when it comes to same-day delivery and last-mile service from its warehouses in Sandefjord, Norway, Stockholm and Borås, Sweden.

The group employed an average of 1 955 employees throughout the year 2022. Komplett Group is headquartered in Sandefjord, Norway, and listed on the Oslo Stock Exchange.

Subsidiaries

Komplett Services AS (“Komplett”) provides consumer electronics on the platforms Komplett.no, Komplett.se and Komplett.dk. The company delivers to the B2B market in Norway and Sweden through Komplettbedrift.no and Komplettforetag.se.

Komplett Distribution AS (“Itegra”) holds the group’s activities in the distribution segment. Itegra is present in Norway and Sweden and serves its customers through the websites Itegra.no and Itegra.se.

Webhallen AB (“Webhallen”) is an omnichannel provider within consumer electronics, with the online platform Webhallen.com and 17 retail stores and pick-up points in Sweden. The company was acquired by Komplett Group in 2013.

NetOnNet AB (“NetOnNet”) has two online shops in Sweden and Norway, NetOnNet.se and NetOnNet.no, and a total of 30 complementary self-service, logistics and warehouse shops located in Sweden and Norway. The company was acquired by Komplett Group in 2022.

Ironstone AS (“Ironstone”) is a 100 per cent cloud company helping businesses with IT solutions ranging from software to customer service. The company was acquired by Komplett Group in 2021.

Through the subsidiaries Komplett Group produce and sell a range of private labels. As of 2022, Komplett, NetOnNet and Webhallen are working to consolidate private label products.

For more information about the subsidiaries and private labels, please see the appendix.

Commitment to human rights and decent working conditions

To ensure commitment to the highest standards of business ethics, Komplett Group have incorporated sustainability into the strategy, business model and governance policies. Respect for fundamental human rights and decent working conditions is a central part of sustainability at Komplett Group and the subsidiaries.

The group will continue to focus the efforts on increasing transparency and overview at all stages of the supply chains to safeguard the people who are impacted by the business. Komplett Group is currently working on increasing due diligence on human rights and decent working conditions in the supply chains. To secure the necessary progress, the group has engaged external consultants to assist in the establishment of risk assessments and new procedures.

The group commitments apply to all subsidiaries and private labels.

GOVERNANCE OF HUMAN RIGHTS AND DECENT WORKING CONDITIONS

Responsibilities

In Komplett Group, sustainability permeates all operations and the organisational structure, from top-level board and management to all levels of the organisation. The board of directors has been informed of the Transparency Act and the duties connected to the law.

The CEO of the group is responsible for the group and the subsidiaries complying with the duties as set out in the act. The CFO of the group is involved in overseeing these efforts and has the ultimate responsibility for corporate governance, including the oversight of strategic planning, review of strategic processes and sustainability reporting. The director legal & compliance of the group has the operational responsibility that the group conduct due diligence on human rights and decent working conditions. This is done in collaboration with the subsidiaries.

Each subsidiary has the responsibility to make sure due diligence and supplier assessments on human rights and decent working conditions is conducted in line with the act and the OECD guidelines. For more information about responsibilities in the subsidiaries, please see the accounts in the appendix.

Policies and governing documents

Each subsidiary within Komplett Group shall have a separate internal Code of Conduct, which describes its commitment to maintaining high ethical standards in line with the group’s overall ambition.

Across all our subsidiaries Komplett Group wants to work with suppliers that share the company’s values and requirements regarding responsible business conduct.

At Komplett, a Code of Conduct is signed as part of the supplier agreement. NetOnNet has specified its supplier requirements in its Supplier Code of Conduct, which include commitments on human and labour rights. In 2023, Komplett, Webhallen and Ironstone aims to adapt standards and requirements from NetOnNet’s Supplier Code of Conduct.

In 2022, no major breaches of the subsidiaries’ Code of Conducts were reported.

Whistleblowing

Komplett Group’s employees are encouraged to report any misconduct related to the company by using the available whistleblower channels at the subsidiaries’ intranet websites. Whistleblower reports are handled in accordance with established whistleblower programs and reporting concerns can relate to any area, including human and labour rights.

Reports of misconduct are handled by a whistleblower group in each subsidiary. All reported concerns are investigated to identify root causes and evaluate corrective and preventive actions, including the potential involvement of relevant authorities, while maintaining the confidentiality of reports in accordance with relevant jurisdiction.

To enable anonymous reporting, the group aims to have an anonymous whistleblower channel in each subsidiary, managed by independent third parties. Komplett, Webhallen

and NetOnNet has these in place. Ironstone has procedures for whistleblowing in place.

In 2022, no report was made through available whistleblower channels.

DUE DILIGENCE WITH RESPECT TO HUMAN RIGHTS AND DECENT WORKING CONDITIONS

Komplett Group values transparency as a key component to ensure that the products sold are of high quality and are manufactured in safe conditions with no violations of human and labour rights. The group aims to implement risk-based supply chain mapping throughout all subsidiaries to identify potential risks and ensure compliance with commitments and standards during 2023.

In 2022, NetOnNet was the only subsidiary of Komplett Group to screen all new suppliers on private label using social criteria based on international guidelines. No screening on products besides private label was conducted.

To strengthen the work on human and labour rights, Komplett Group aims for all its subsidiaries to implement procedures and report on their performance in due diligence in line with the OECD guidelines and the Transparency Act during 2023.

Due diligence assessment

Through supervised workshops in May 2023, Komplett Group and each of the subsidiaries conducted a strategic due diligence assessment in accordance with the requirements of the Transparency Act. The assessment was based on a methodology including ISO Standard 31000 for risk management, with the aim to identify and prioritise risk related to the com-

pany's ability to promote and protect human rights and decent working conditions.

In the assessment, the group and subsidiaries looked at risks associated with its own operations, business partners and supply chains. Key employees with insight into the value chain and procurement processes participated, and both internal and external risk was covered.

Based on the risk assessment conducted by the subsidiaries, Komplett Group has identified the following risks at group level:

Internal risk:

For Komplett Group the fact that due diligence and supplier assessment on human rights and decent working conditions are not done according to the guidelines from OECD is identified as a severe risk. Besides on private label in NetOnNet, no screenings or assessments are done regarding suppliers.

Further, upskilling, resources and system support are required, and this is contributing to the risk as it makes it challenging to carry out due diligence and supplier assessments accordingly. A consequence of this is limited transparency and knowledge about the potential risk in the supply chains.

As for the company's own operations, a relevant risk is health and safety for employees in warehouses and stores. However, the risk is considered to be low due to strict regulations for health and safety in the workplace as well as workers' rights in general.

External risk:

For Komplett Group the identified external factor of most severe risk is the use of minerals in for example mobile phones and computers. Activities includes the extraction, transport, handling, trading, processing, smelting, refining and alloying of the raw materials.

These minerals are defined by OECD as high-risk raw materials, when sourced from a conflict-affected and high-risk areas identified by the presence of armed conflict, widespread violence or other risks of harm to people.

As these minerals are part of the first-tier suppliers' supply chains, Komplett Group has limited insight and impact on the sourcing of the minerals. However, due to the severeness, the group has identified it as a risk area to keep an eye on going forward.

Further, the groups supply chains are of high complexity, which may increase the risk of violation of human rights and decent working conditions both in production and distribution. Regarding private label there is a risk factor that these are produced in China and that there is no transparency, assessments or control beyond first-tier suppliers.

For more information about findings in the subsidiaries' due diligence assessments, please see the appendix.

MITIGATION OF RISK

Based on the risk assessment, Komplett Group has not identified actual negative impacts on fundamental human rights and decent working conditions linked to the company's own operations, the supply chains and business partners. The company has identified the following measures to manage potential negative impacts:

- ▶ Develop routines, checklists and other governing documents for due diligence and assessments of suppliers at group level.
- ▶ Assess the need for resources and competence.
- ▶ Assess the need for system support.
- ▶ Establish a plan for competence development on duties in the act, human rights and decent working conditions and supplier assessments.

- ▶ Increase knowledge and carry out risk assessment of the use of conflict minerals in products provided.
- ▶ Risk mapping of countries, products, and raw materials.
- ▶ Screening and risk prioritisation of suppliers. Carry out in-depth assessments of suppliers based on risk profile.
- ▶ Establish systems and routines for assessment of first-tier suppliers through self-assessment /questionnaires.
- ▶ Increase knowledge and start to carry out self-assessment questioners of subcontractors of private label.

Through implementing these measures, Komplett Group and the subsidiaries will establish a clear overview of all risks related to human rights and decent working conditions. Further, measures will contribute to monitor potential risk and adverse impact that might occur in the supply chains.

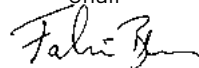
DUTY TO PROVIDE INFORMATION

In the reporting year the group and subsidiaries have handled information requests regarding products and services accordingly to the duty to provide information.

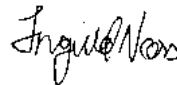
Sandefjord, 15 June 2023
Board of directors and CEO, Komplett ASA



Jo Olav Lunder
Chair



Fabian Bengtsson
Director



Ingvild Næss
Director



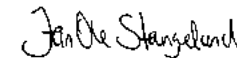
Anna Fernmo
Worker director



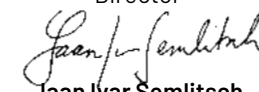
Susanne Ehnbage
Director



Anders Odden
Worker director



Jan Ole Stangeland
Director



Jaan Ivar Semlitsch
CEO

APPENDIX

KOMPLETT SERVICES AS & KOMPLETT DISTRIBUTION AS – TRANSPARENCY ACT ACCOUNT

This account has been prepared in accordance with the Transparency Act and covers activities in Komplet Services AS and Komplet Distribution AS (“Komplet”). It summarises governance, policies, and procedures regarding the protection of human rights and decent working conditions, as well as risk identified in the due diligence assessment and measure to mitigate these risks.

ABOUT KOMPLETT

Komplet provides consumer electronics on the platforms Komplet.no, Komplet.se and Komplet.dk. Komplet also operates two pick-up points, one in Oslo and one at the warehouse in Sandefjord. Komplet delivers to the B2B market in Norway and Sweden through Kompletbedrift.no and Kompletforetag.se. The head office is located in Sandefjord, Norway.

Through the brand Itegra, Komplet holds the group’s activities in the distribution segment and consist of large-scale distribution contracts for sale to resellers and other big entities not covered by B2B. Itegra is present in Norway and Sweden and serves its customers through the websites Itegra.no and Itegra.se.

Komplet mainly sells products from large and established brands. Throughout 2022, Komplet collaborated with 509 first-tier suppliers. Komplet also offers private label products under the brand names Svive, Iiglo, Intono, Kameleon, Komplet PC, 3241 and Protech. The company’s procurement partners for its

private label products are F&H, CBK and Calisto. Going forward Komplet will collaborate with NetOnNet on the sourcing of private labels.

Commitments to human rights and decent working conditions

Komplet complies with the Komplet Group commitments. For more information, please see the Komplet Group Account.

GOVERNANCE OF HUMAN RIGHTS AND DECENT WORKING CONDITIONS

Responsibilities

The board of directors of Komplet Group has been informed of the Transparency Act and the duties connected to the law. The CEO of the group is responsible for the group and the subsidiaries complying with the duties set out in the act.

Komplet’s quality manager and the category department have the responsibility for conducting due diligence on human rights and decent working conditions in line with the act and the OECD guidelines.

For more information on responsibilities, please see the Komplet Group Account.

Policies and governing documents

Komplet expects its suppliers to share the values and requirements regarding responsible business conduct. The Code of Conduct is signed by the supplier as part of the agreement. In 2022, no major breaches of the Code of Conduct were reported.

Komplet is working on updating the Code of Conduct in line with its increased sustainability standards and to bring it up to internationally recognised initiatives, such as the UN Guiding Principles on Business and Human Rights.

For more information on policies and governing documents, please see the Komplet Group Account.

Whistleblowing

Komplet has a channel for whistleblowing in place. For more information, please see the Komplet Group Account.

DUE DILIGENCE WITH RESPECT TO HUMAN RIGHTS AND DECENT WORKING CONDITIONS

Due diligence assessment

Through a supervised workshop in May 2023, Komplet conducted a strategic due diligence assessment in accordance with the requirements of the Transparency Act. The assessment was based on a methodology including ISO Standard 31000 for risk management, with the aim to identify and prioritise risk related to Komplet’s ability to promote and protect human rights and decent working conditions.

In the assessment, Komplet looked at risks associated with its own operations, business partners and supply chains. Key employees with insight into the value chain and procurement processes participated. Both internal and external risk was covered.

Internal risk:

Komplett has identified a need for additional expertise and resources to strengthen the work on due diligence and supplier assessments. Further, system support is needed for the company to be able to carry out assessments of the supply chains in an effective way and to provide documentation to stakeholders regarding information request.

Further, Komplett does not have a risk profile of products and commodities which makes it challenging to prioritise suppliers and areas in need of screening and assessments.

External risk:

Komplett has identified minerals from conflict-affected and high-risk areas as a matter of severe risk. For more information about this, please see the Komplett Group Account.

Further, protection of human rights and decent working conditions in production, as well as chemical use in this part of the supply chains is seen as areas of high risk. The risk is increasing as the supply chain is complex and has a low degree of transparency. There is also a lack of competence in the supply chain on these

matters. Lastly, Komplett has identified human rights and decent working conditions in distribution as an area of risk, especially outside of Scandinavia.

MITIGATION OF RISK

Measures

Based on the strategic due diligence assessment, Komplett has not identified actual negative impacts on fundamental human rights and decent working conditions linked to the company's own operations, the supply chains and business partners.

To gain better insight in the supply chains an important measure in 2022 has been a project to further monitor sourcing partners through audits for compliance with the standards and requirements set out in the company's Code of Conduct.

For the potential negative impacts identified in the strategic due diligence assessment, the following measures and initiatives have been identified:

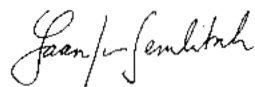
- ▶ Establish a plan for supplier screening and assessments.

- ▶ Self-assessment surveys of new and existing suppliers.
- ▶ Assess the need for resources and competence.
- ▶ Establish a plan for competence development.
- ▶ Update existing agreements with an updated Code of Conduct.
- ▶ Risk mapping of countries, products, and raw materials.
- ▶ Collaborate with NetOnNet regarding sourcing of private label.

Implementation of measures will start in 2023 and provide Komplett with a better overview of all risks related to human rights and decent working conditions. Further, measures will contribute to monitor potential risk and adverse impact that might occur.

Sandefjord, 15 June 2023

Board of directors and CEO, Komplett Services AS & Komplett Distribusjon AS



Jaan Ivar Semlitsch
Chair



Katharina Eriksen
Director



Thomas Røkke
Director



Erlend Stefansson
CEO

NETONNET AB – TRANSPARENCY ACT ACCOUNT

This account has been prepared in accordance with the Transparency Act and covers activities in NetOnNet AB (“NetOnNet”). It summarises governance, policies, and procedures regarding the protection of human rights and decent working conditions, as well as risk identified in the due diligence assessment and measure to mitigate these risks.

ABOUT NETONNET

NetOnNet has two online shops in Sweden and Norway, NetOnNet.se and NetOnNet.no, and a total of 30 complementary self-service, logistics and warehouse shops located in Sweden and Norway. Since 2022, NetOnNet has been part of Komplet Group. The head office is located in Borås, Sweden.

NetOnNet mainly sells products from large and established brands. The company also offers private label products under the brand names Andersson, Freev, Austin and Barbeque, ON, Skantic, Mission SG, Centurion & ZON - Home of Victory. NetOnNet collaborated with 167 private label suppliers in 2022. The private labels are sourced through the company’s sourcing office in Dongguan, China. In 2022, NetOnNet introduced 356 new products under its private labels.

Commitments to human rights and decent working conditions

NetOnNet complies with the group commitments. For more information, please see the Komplet Group Account.

GOVERNANCE OF HUMAN RIGHTS AND DECENT WORKING CONDITIONS

Responsibilities

The board of directors has been informed of the Transparency Act and the duties connected to the law. The CEO of the group is responsible for the group and the subsidiaries complying with the duties as set out in the act.

NetOnNet’s head of communications & sustainability is responsible for the work related to sustainability at NetOnNet. This includes an overall responsibility for social matters, including human and labour rights. The category department has a particular responsibility for screening and assessment on human and labour rights of private label.

The distribution of responsibility for conducting due diligence on human rights and decent working conditions in line with the act and the OECD guidelines is in progress.

For more information on responsibilities, please see the Komplet Group Account.

Policies and governing documents

NetOnNet’s Supplier Code of Conduct, is based on the UN Universal Declaration of Human Rights, the ILO’s (International Labour Organisation) eight fundamental human rights conventions on working life, the Convention on the Rights of the Child, UN Global Compact, and the OECD Guidelines for the Operations of Multinational Enterprises.

All of NetOnNet’s suppliers of private label have signed NetOnNet’s Supplier Code of Conduct. Further, all subcontractors are to comply with the requirements. If the supplier has their own Code of Conduct, they must comply with at least the same level and provide NetOnNet with information about its subcontractors upon request.

For more information on policies and governing documents on group level, please see the Komplet Group Account.

Whistleblowing

NetOnNet has a channel for whistleblowing in place. For more information, please see the Komplet Group Account.

DUE DILIGENCE WITH RESPECT TO HUMAN RIGHTS AND DECENT WORKING CONDITIONS

NetOnNet purchases products directly from global consumer electronics manufacturers and distributors. Asia dominates the production of consumer electronics, with China being by far the dominant manufacturing country.

NetOnNet has commercial agreements with all its 167 private label suppliers in China, where the Supplier Code of Conduct is a key component. Private label suppliers are not allowed to use subcontractors that are not approved by NetOnNet. Compliance is ensured through ongoing physical inspections as part of its factory audits. NetOnNet’s inspection protocol is based on the standards from ISO 9001 and the CSR audit based in BSCI Code of Conduct. This includes questions on human and labour rights.

The aim is to inspect each factory at least every two years. Despite restrictions linked to the pandemic in the beginning of the year, NetOnNet still managed to carry out 88 audits in 2022. These include both announced and unannounced audits, and 26 were conducted at new suppliers.

Due diligence assessment

Through a supervised workshop in May 2023, NetOnNet conducted a strategic due diligence assessment in accordance with the requirements of the Transparency Act. The assessment was based on a methodology including ISO Standard 31000 for risk management, with the aim to identify and prioritise risk related to NetOnNet's ability to promote and protect human rights and decent working conditions.

In the assessment, NetOnNet looked at risks associated with its own operations, business partners and supply chains. Key employees with insight into the value chain and procurement processes participated and both internal and external risk were covered.

Internal risk:

NetOnNet has identified a future need for additional expertise and resources to strengthen the work on due diligence and supplier assessments going forward. Further, system support is needed for the company to be able to carry out due diligence and assessments of suppliers in line with the OECD guidelines in the future.

NetOnNet does not conduct screening or assessments of brand suppliers and have no insight or control beyond first-tier suppliers of private label. The brand suppliers do however sign the Supplier Code of Conduct. As of business partners and distributions partners, the Supplier Code of Conduct has not been signed.

External risk:

NetOnNet has identified minerals from conflict-affected and high-risk areas as a matter of severe risk. For more information on this, please see the Komplett Group Account. Working conditions at subcontractors to first-tier suppliers of private label is also considered an area of severe risk as most of the production is done in China. There is also uncertainty to if and how first-tier suppliers screen and assess the subcontractors. As for brand suppliers, there is low degree of transparency on how they work to protect human rights and decent working conditions.

MITIGATION OF RISK

Measures

Based on the strategic due diligence assessment and other conducted screenings, NetOnNet has not identified actual negative impacts on fundamental human rights and decent working conditions linked to its own operations, the supply chains and business partners.

Going forward, NetOnNet aims, in addition to audits, to provide all suppliers with men-

tors who can help them set requirements for their subcontractors, of which there are typically 40-50 per factory. NetOnNet is looking at the possibility of subcontractors conducting self-assessment going forward.

For the potential negative impacts identified in the strategic due diligence assessment the following measures and initiatives have been identified:

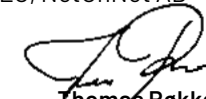
- ▶ Establish system support for self-assessment questioners for first-tier suppliers.
- ▶ Increase knowledge and carry out risk assessment of the use of conflict minerals in products provided.
- ▶ Increase knowledge and start to carry out due diligence assessment of subcontractors of private label.
- ▶ Map the need for internal system support and resources.
- ▶ Establish a plan for competence development.

Implementation of measures will start in 2023 and provide NetOnNet with better transparency related to human rights and decent working conditions. Further, measures will contribute to monitor potential risk and adverse impact that might occur.

Sandefjord, 15 June 2023 – Board of directors and CEO, NetOnNet AB


Jaan Ivar Semlitsch
Chair


Susanne Holmström
Director and CEO


Thomas Røkke
Director

WEBHALLEN AB – TRANSPARENCY ACT ACCOUNT

This account has been prepared in accordance with the Transparency Act and covers activities in Webhallen AB (“Webhallen”). It summarises governance, policies, and procedures regarding the protection of human rights and decent working conditions, as well as risk identified in the due diligence assessment and measure to mitigate these risks.

ABOUT WEBHALLEN

Webhallen is one of Sweden’s leading retailers in hardware, home electronics, gadgets, games and film. The company is an omnichannel provider with the online platform Webhallen.com and 17 retail stores and pick-up points, located strategically around Stockholm and bigger cities in Sweden. The company was acquired by Komplet Group in 2013 and has the head office in Stockholm, Sweden.

Webhallen mainly sells products from large and established brands. Throughout 2022, Webhallen collaborated with 754 suppliers. Webhallen does not have its own private labels, but source private labels from NetOnNet and Komplet.

Commitments to human rights and decent working conditions

Webhallen complies with the group commitments. For more information, please see the Komplet Group Account.

GOVERNANCE OF HUMAN RIGHTS AND DECENT WORKING CONDITIONS

Responsibilities

The board of directors has been informed of the Transparency Act and the duties connected

to the law. The CEO of the group is responsible for the group and the subsidiaries complying with the duties as set out in the act.

Webhallen’s procurement department have the responsibility for conducting due diligence on human rights and decent working conditions in line with the act and the OECD guidelines.

For more information on responsibilities on group level, please see the Komplet Group Account.

Policies and governing documents

Webhallen’s Code of Conduct for employees describes its commitment to maintaining high ethical standards in everything the company does. It sets out the standards of behaviour that Webhallen can expect from internal parties, and what external parties can expect from Webhallen. In 2022, Webhallen did not have a Code of Conduct for suppliers.

For more information on group policies and governing documents, please see the Komplet Group Account.

Whistleblowing

Webhallen has a channel for whistleblowing in place. For more information, please see the Komplet Group Account.

DUE DILIGENCE WITH RESPECT TO HUMAN RIGHTS AND DECENT WORKING CONDITIONS

Due diligence assessment

Through a supervised workshop in May 2023, Webhallen conducted a strategic due diligence

assessment in accordance with the requirements of the Transparency Act. The assessment was based on a methodology including ISO Standard 31000 for risk management, with the aim to identify and prioritise risk related to Webhallen’s ability to promote and protect human rights and decent working conditions.

In the assessment, Webhallen looked at risks associated with its own operations, business partners and supply chains. Key employees with insight into the value chain and procurement processes participated and both internal and external risk was covered.

Internal risk:

Webhallen does not conduct due diligence or supplier screening/assessments on human rights and decent working conditions on either new or existing suppliers. The company has identified a need for additional expertise and resources to strengthen the work on due diligence and supplier assessments. Further, system support is needed for Webhallen to be able to carry out assessments of the supply chains accordingly.

A consequence is that Webhallen has limited transparency and knowledge about potential risk that might occur in the supply chains. As for the company’s own operations, Webhallen has identified health and safety for employees in warehouses and stores as an area of risk. However, the risk is considered to be low due to strict regulations on health and safety and employee rights.

External risk:

Webhallen has identified minerals from conflict-affected and high-risk areas as a severe risk. For more information about this, please see the Komplett Group Account. The same goes for working conditions in the production part of the supply chains. The supply chains are of high complexity which may increase the risk of violation of human rights and decent working conditions. Further, working-conditions in distribution are also considered an area of risk.

MITIGATION OF RISK

Measures

Based on the strategic due diligence assessment, Webhallen has not identified actual negative impacts on fundamental human rights and decent working conditions linked to its own operations, the supply chains and business partners.

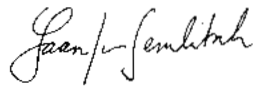
For the potential negative impacts identified in the due diligence assessment the following measures and initiatives have been identified:

- ▶ Develop routines, checklists and other governing documents for due diligence and screening/assessments of suppliers.


- ▶ Assess the need of resources.
- ▶ Establish a plan for competence development.
- ▶ Risk mapping of countries, products and raw materials.

Implementation of measures will start in 2023 and enable Webhallen to implement guidelines and procedures for conducting due diligence and supplier assessments. Further, the measures will contribute to monitor potential risk and adverse impact that might occur.

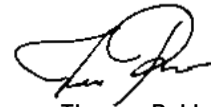
Sandefjord, 15 June 2023
Board of directors and CEO, Webhallen AB



Jaan Ivar Semlitsch
Chair



Katharina Eriksen
Director



Thomas Røkke
Director



Anders Torell
CEO

IRONSTONE AS – TRANSPARENCY ACT ACCOUNT

This account has been prepared in accordance with the Transparency Act and covers activities in Ironstone AS (“Ironstone”). It summarises governance, policies, and procedures regarding the protection of human rights and decent working conditions, as well as risks identified in the due diligence assessment and measure to mitigate these risks.

ABOUT IRONSTONE AS

Ironstone is a 100 per cent cloud company helping businesses with IT solutions ranging from software to customer service. Ironstone aims to be a business partner rather than a traditional IT partner and delivers hardware through Komplet Group as part of their service. Ironstone was acquired by Komplet Group in 2021. The head office is located in Oslo, Norway.

Commitments to human rights and decent working conditions

Ironstone complies with the group commitments. For more information, please see the Komplet Group Account.

GOVERNANCE OF HUMAN RIGHTS AND DECENT WORKING CONDITIONS

Responsibilities

The board of directors has been informed of the Transparency Act and the duties connected to the law. The CEO of the group is responsible for the group and the subsidiaries complying with the duties as set out in the act.

In Ironstone, the CEO is responsible for the company conducting due diligence on human

rights and decent working conditions in line with the act and the OECD guidelines.

For more information on group responsibilities, please see the Komplet Group Account.

Policies and governing documents

In 2022, Ironstone did not have an internal or supplier Code of Conduct. For more information on group policies and governing documents, please see the Komplet Group Account.

Whistleblowing

Ironstone has procedures for whistleblowing in place. For more information, please see the Komplet Group Account.

DUE DILIGENCE WITH RESPECT TO HUMAN RIGHTS AND DECENT WORKING CONDITIONS

Due diligence assessment

Through a supervised workshop in May 2023, Ironstone conducted a strategic due diligence assessment in accordance with the requirements of the Transparency Act. The assessment was based on a methodology including ISO Standard 31000 for risk management, with the aim to identify and prioritise risk related to Ironstone’s ability to promote and protect human rights and decent working conditions.

In the assessment, Ironstone looked at risks associated with its own operations, business partners and supply chains. Key employees with insight into the value chain and procurement processes participated and both internal and external risk was covered.

Internal risk:

Ironstone has identified limited resources and competence to conduct in-depth screening of suppliers as a risk for the company’s ability to promote human rights and decent working conditions.

External risk:

A part of the services, Ironstone may deliver hardware to customers, supplied by Komplet. Some of these hardware products are risk exposed as they contain minerals where it is considered to be a high risk of violation of human rights and working conditions. For more information about minerals from conflict-affected and high-risk areas, please see the Komplet Group Account.

Further, Ironstone has identified materials used in data centres as an area that might involve risk.

MITIGATION OF RISK

Measures

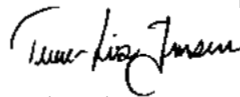
Based on the strategic due diligence assessment, Ironstone has not identified actual negative impacts on fundamental human rights and decent working conditions linked to its own operations, the supply chains and business partners. For the potential negative impacts identified in the due diligence assessment the following measures and initiatives have been identified:

- ▶ Develop routines, checklists and other governing documents for due diligence and assessments of suppliers.

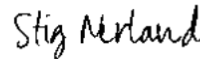
- ▶ Establish systems and routines for assessment of first-tier suppliers through self-assessment /questionnaires.
- ▶ Assess the need for resources and competence.
- ▶ Risk prioritisation of existing suppliers
- ▶ Map the conditions in the service parks of business partners.

Implementation of measures will start in 2023 and enable Ironstone to implement guidelines and procedures for conducting due diligence and supplier assessments. Further, the measures will contribute to monitor potential risk and adverse impact that might occur.

Sandefjord, 15 June 2023
Board of directors and CEO, Ironstone AS



Trine-Lise Jensen
Chair



Stig Nerland
Director



Erlend Stefansson
Director and CEO

Komplett ASA

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