

## **Metrostav Norge AS**

Description of the due diligence assessments pursuant to section 4 of the Transparency Act.

### COMPANY'S REPORT ACCORDING TO THE TRANSPARENCY ACT FOR 2023

#### 1.1 Introduction

The purpose of the Transparency Act is to promote companies' respect for fundamental human rights and decent labour conditions.

This report describes the measures implemented by the company to reduce the risk of negative consequences that the company's activities and business relationships may have for fundamental human rights and decent working conditions. Section 4 of the Transparency Act requires Metrostav Norge AS to conduct due diligence assessments with the aim of identifying actual and potential negative impacts on fundamental human rights and decent working conditions, see Section 4 (a-f). According to Section 5 of the Act, the results of the due diligence assessments shall be published in an annual report.

The report is structured as follows: Section 2 contains a description of organisation, the division of responsibilities under the Transparency Act, as well as the company's guidelines and procedures for handling and following up the Transparency Act. The results of the due diligence assessments Metrostav Norge AS has carried out are described in section 3. Finally, an account is given of the measures Metrostav Norge AS has implemented to follow up the results of the due diligence assessments.

#### 1.2 Contact information

Enquiries about this report can be directed to:

Metrostav Norge AS, Financial Director, Ales Richter, [ales.richter@metrostav-norge.no](mailto:ales.richter@metrostav-norge.no)

#### 1.3 Reporting obligation

The company is headquartered and domiciled in Norway.

At the balance sheet date, the company has sales revenues of NOK 613 998 thousand in 2023 and total assets of NOK 460 505 thousand. In the 2023 financial year, the company had an average of 143 full-time equivalents. The company is therefore subject to reporting requirements.

## 2. About the company

### 2.1 The company's organisation and area of operation

Metrostav Norge AS is organised by a Board of Directors consisting of three board members, including the Chairman of the Board. The Board of Directors is responsible for decisions related to financial, environmental and social issues. The Board of Directors has ultimate responsibility for the due diligence assessments carried out in Metrostav Norge AS and is responsible for anchoring responsibility in the organisation's guidelines.

The administration is led by the general manager. The general manager handles and conducts due diligence assessments in close cooperation with the management team.

Metrostav Norge AS is a technically advanced building and construction contractor that focuses primarily on transport projects, specialising in tunnelling and the construction of other underground structures, as well as the construction of bridges and other reinforced and prestressed concrete structures. The company is currently active in Norway, Sweden and the Faroe Islands.

### 2.2 Internal guidelines

The company has its own procedures for how we anchor our work on human rights and decent working conditions. The procedures cover the company's work to fulfil the requirements of the Transparency Act.

Metrostav Norge AS is governed by its internal regulations, which are publicly available on the company's website. These include the [Ethical Guidelines](#) and [Compliance Policy](#). These documents clearly describe the company's procedures and objectives related to the protection of human rights and labour conditions.

As part of the Code of Conduct, the company has an ethics hotline, which can be called anonymously at any time to report violations of the Code or the law. The company is committed to handling all incidents or actions reported through this hotline.

Part of the processes is a fixed control system that is interwoven with self-monitoring, direct control by the superior, functional controls, operational controls or internal and external audits.

## 3. The due diligence assessment

### 3.1 Overview of the company's focus for the due diligence assessment - methodology

If the subcontractors are not covered by the Transparency Act, they are obliged, at the companies' request, to provide information on the purchase of goods and supply chains.

In the further mapping work, Metrostav Norge AS will use digitised solutions that can contribute to more transparent and secure mapping.

The system also includes regular due diligence (checks on business partners to assess their credibility and compliance with binding rules). All are integrated into the company's requirements and Code of Conduct. The company has also established a criminal law compliance programme as a central management superstructure, which is based on checks of business partners and managers and includes a fixed system for regular employee training.

The company communicates the information required by the Transparency Act to subcontractors already in the contact phase. Anyone who enters into a subcontract with Metrostav Norge AS must also comply with the legal terms and conditions and the terms of Metrostav Norge AS' internal regulations, which are often stricter than the legal terms.

Metrostav Norway respects its employees' right to organise within the framework of applicable laws and statutes. It undertakes to respect the personal dignity, privacy and rights of every individual and not to tolerate unacceptable treatment of employees, such as physical punishment, sexual or personal harassment and discrimination. Metrostav Norway will ensure fair payment and payment of any national legal minimum wage provisions to its employees. It will further ensure that the maximum working hours established in the respective country are observed.

Metrostav Norge is encouraged to communicate the basic principles of this Code of Conduct to its immediate contract partners, to promote compliance with its content to the best of its ability among its contract partners and to require that they also comply with the Code of Conduct. Metrostav Norway is further encouraged to recommend its contractual partners to in turn encourage their contractual partners to follow the Code of Conduct.