

## **Human Rights Policy and Human Rights Due Diligence Procedures Bilpleie Holdco AS and its subsidiaries**

### **1. Introduction**

The company's guidelines on human rights and decent working conditions are in line with the requirements of the **Norwegian Transparency Act**, the **UN Universal Declaration of Human Rights**, the **UN International Covenant on Civil and Political Rights**, the **UN International Covenant on Economic, Social and Cultural Rights**, and the **ILO** core conventions.

The company has **zero tolerance** for modern slavery, child labour, forced labour, and human trafficking. Harassment, discrimination, and inhumane treatment are strictly prohibited throughout the company's value chain.

The **Bilpleie Holdco AS** group continuously works to ensure compliance with labour law requirements, including living wages and working hours, and respects the right to freedom of association and freedom of expression. The company is committed to identifying, preventing, and addressing violations of human rights within its own operations and supply chain, and firmly rejects any form of violence against human rights defenders or peaceful protesters.

The Group has a **Code of Conduct** that outlines its expectations to all employees, consultants, business partners, and contractors associated with the company.

### **2. Our Approach**

The company aims to have a positive impact by proactively identifying and addressing potential human rights violations in its supply chain and in local communities. **Once a year**, Bilpleie Holdco AS carry out our due diligence assessment, which is aligned with the **OECD Guidelines for Responsible Business Conduct** and includes:

- Ensuring the implementation of responsible business practices in policies and management systems (e.g., through supplier codes of conduct, procurement procedures, and whistleblowing channels)
- Regular assessment of exposure and risk of human rights violations, based on insights from stakeholders, industry knowledge, and materiality assessments. These insights are used to improve our practices and processes.
- Establishing measures to prevent and address any violations.
- Monitoring and following up on human rights efforts to evaluate and adjust both risk understanding and the effectiveness of the measures as needed.
- Once a year, the company reports openly on this through its statement in accordance with the Transparency Act. This statement is available on website: [Bilpleie Holdco AS](#)

### 3. Actions in Case of Violations

When identifying human rights violations within the business or supply chain, the company commits to:

- Reporting the case to the company's top executive.
- Handling and remediating the situation in line with the **UN Guiding Principles on Business and Human Rights**; this means corrective measures will be implemented as a first step. Termination of supplier relationships will only be a last resort.
- Where a violation occurs, the company will also investigate and, if necessary, involve various actors in the value chain to resolve the case in the best possible way for the person or people who have experienced a rights violation.

### 4. Expectations for Partners and Suppliers

The company expects all employees, suppliers, and partners to share the commitment to the **UN Universal Declaration of Human Rights** and to comply with the company's ethical guidelines.

The company reports on its efforts and results related to human rights and takes necessary actions to maintain its standards.

### 5. Responsibilities

The CEO of Bipleie Holdco AS is responsible for approving this policy.


The Management teams are responsible for implementing it in relevant business areas, especially within the supply chain and procurement.

Employees in relevant functions are responsible for adhering to the policy.

### 6. Related guidelines:

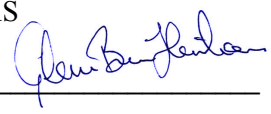
- Supplier Code of Conduct, 02./2025
- Guidelines for Notification of criticism (Whistleblowing), Bipleie Holdco AS, *Revised on 05.05.2025.*

**ISSUED**  
by the **HR Manager** of Bipleie Holdco  
AS

  
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Sandris Rakauskis  
09.09.2025.

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**CONFIRMED**  
by the **CEO** of Bipleie Holdco  
AS

  
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Glenn Brun Henriksen  
11.09.2025.

**bipleie holdco as**  
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## Human Rights Due Diligence Procedures

### 1. Implementation

- 1.1. ENSURE routines and guiding documentation are in place and are reviewed regularly.
- 1.2. ENSURE training for relevant personnel (purchasing, HR, Management teams).
- 1.3. ENSURE that top management across subsidiaries get regular training and that metrics are followed up.

#### Procedures:

Activity	Responsible	Timeline
Annually review of guiding documentation: policies, routines etc.	Sandris Rakauskis, HR Manager, Bipleie Holdco AS	<b>August</b>
Updated training for CEOs and other relevant personnel	Sandris Rakauskis, HR Manager, Bipleie Holdco AS	<b>October</b>
Regular review of performance across subsidiaries	Bipleie Holdco AS with input and collaboration with CEOs	<b>Every 6 months</b>

### 2. Mapping and Risk Assessment

- 2.1. Establish and maintain a risk register using **TILD**.
- 2.2. Annually: assess geographic risk and product risk.
- 2.3. Annually: risk mapping of supply chain (questionnaires, audits, etc).

#### Procedures:

Activity	Responsible	Timeline
Establish, and regularly update, risk register for Bipleie Holdco AS, covering risks relevant for all subsidiaries.	Bipleie Holdco AS with input and collaboration with CEOs	<b>Every 6 months</b>
Provide training to subsidiaries on risk management and ensure guidance to enable them to register risks regularly.	Sandris Rakauskis, HR Manager, Bipleie Holdco AS	<b>October</b>
Annual assessment of supply chain risk across subsidiaries.	Bipleie Holdco AS leads the process, CEOs participate	<b>January</b>
Distribution of questionnaire and analysis of responses. <b>Subsidiaries</b> are following up for suppliers. <b>Bipleie Holdco AS</b> follow up shared suppliers such as Ditec AS, Elis AS.	Each subsidiary	<b>January</b>
Analysis of responses across the group.	Sandris Rakauskis, HR Manager, Bipleie Holdco AS	<b>February</b>

### 3. Preventive actions and mitigation

- 3.1. Ensure **Suppliers Code of Conduct** is in place and that requirements are communicated to suppliers.
- 3.2. Implement procedures to follow up suppliers.

3.3. Develop sanctions, actions plans or other actions as a result of lacking compliances.

**Procedures:**

Activity	Responsible	Timeline
Ensure routines and guidelines for <b>distribution of Code of Conduct</b> and provide training to all subsidiaries.	Sandris Rakauskis, HR Manager, Bilpleie Holdco AS	<b>Guidelines: September</b> <b>Training: October</b>
Develop routines and guidelines for <b>supplier follow up</b> : how to define high risk, how many to follow up, where the responsibility is etc. Provide training to subsidiaries.	Sandris Rakauskis, HR Manager, Bilpleie Holdco AS	<b>Guidelines: November</b> <b>Training: October-November</b>
Select <b>high risk suppliers for follow up</b> meetings or potential audits.	Sandris Rakauskis, HR Manager, Bilpleie Holdco AS	<b>February</b>
Follow up high risk suppliers and agree action plan where appropriate	Bilpleie Holdco AS leads the process, CEOs participate	<b>February - March</b>

**4. Measuring and monitoring**

4.1. Establish **KPIs**.

4.2. Internal controls and audits to ensure compliance across **the Bilpleie Holdco AS group**.

4.3. Periodical report to management on developments and status.

**Procedures:**

Activity	Responsible	Timeline
Establish KPIs and review periodically.  Define the reporting process and train subsidiaries.	Bilpleie Holdco AS with implementation across the group.	<b>Identify KPIs: October-November</b>  <b>Training: October-November</b>
Annually internal audit to ensure compliance.	Sandris Rakauskis, HR Manager, Bilpleie Holdco AS	<b>August</b>
Collect and aggregate data from subsidiaries to management reports on KPIs/performance metrics.	Sandris Rakauskis, HR Manager, Bilpleie Holdco AS	<b>Quarterly</b>

**5. Reporting and Transparency**

5.1. Develop the annual report in line with the Transparency Act.

5.2. Update website with the new Transparency Act report.

5.3. Ensure communication channels for inquiries available on the website.

**Procedures:**

Activity	Responsible	Timeline
Aggregate data from internal audits, KPIs and supplier questionnaires across subsidiaries.	Sandris Rakauskis, HR Manager, Bipleie Holdco AS	May
Prepare a report and ensure it is signed by the Board.	Sandris Rakauskis, HR Manager, Bipleie Holdco AS	June
Publish the report online and provide link and text to subsidiaries to do the same.	Sandris Rakauskis, HR Manager, Bipleie Holdco AS	By June 30
Ensure link on website with an e-mail address that stakeholders can use for more information.	Sandris Rakauskis, HR Manager, Bipleie Holdco AS	By June 30
Respond to inquiries within 3 weeks, ensure subsidiaries pass on inquiries to Bipleie Holdco AS or that they can respond themselves.	Sandris Rakauskis, HR Manager, Bipleie Holdco AS	Regularly

## 6. Remediation and Grievance Mechanisms

- 6.1. Establish whistleblowing channels for employees and externals.
- 6.2. Ensure training for how to handle grievances, with deadlines, actions and responsables.
- 6.3. Routines for dialogues and potential compensation.

### Procedures:

Activity	Responsible	Timeline
Ensure all subsidiaries are familiar with grievance mechanisms.	Sandris Rakauskis, HR Manager, Bipleie Holdco AS	Training October
In case of grievances, HR will report to the CEO.	CEOs	Regularly
Solve grievances in alignment with human rights policy.	CEOs	Regularly
Monitor and report on the number of grievances.	Each CEO to Bipleie Holdco AS	Quarterly (KPIs)

### ISSUED

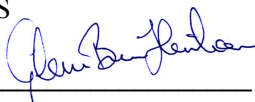
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