



## Human Rights and Transparency Act Report

### About the Transparency Act

Norwegian Transparency Act came into effect the 1<sup>st</sup> of July 2022. The Act is relating to enterprises' transparency and work on fundamental human rights and decent working conditions. It applies to larger enterprises that are resident in Norway and that offer goods and services in or outside Norway in addition to enterprises outside Norway that offer goods and services in Norway, and that are liable to tax to Norway pursuant to internal Norwegian legislation.

### About Griptel

Griptel designs and manufactures mounting equipment in galvanized steel. Our products are the safest mounting equipment for vulnerable electronic equipment, communication equipment and other technical infrastructure. With mounting equipment of the highest quality, Griptel contributes to reduced downtime for electronic equipment, better HSE and lower maintenance costs.

Our head office is located at Vøyenenga in Bærum municipality, Norway. In addition to management, administration, design and engineering functions, the headquarter also contains a warehouse and logistics facility.

Griptel employs 14 workers in Norway, including 7 warehouse employees, with one of them being a member of the labor unions LO and Fellesforbundet. Their working conditions and salaries are protected by the collective agreement 'Grossistoverenskomsten.' Griptel is also a member of VIRKE, The Federation of Norwegian Enterprise.

Griptel's primary manufacturing facility, Gripsteel, is located in Riga, Latvia. By combining proprietary design with in-house production at our own factory, we maintain complete control over the production process and ensure the highest product quality.

Griptel is headed up by CEO Pål Bjørdal. The company is owned by industrial investors with extensive experience from construction and maintenance of critical communication equipment.

# GRIPTel

## Our guidelines and routines

Griptel AS utilizes the Simployer employee management system, a comprehensive digital platform housing essential employee data, including the employee handbook with policies, employee rights, and company regulations. The system also features a Health, Safety, and Environment (HSE) handbook, ensuring compliance with HSE protocols, internal whistleblowing mechanisms, and a substance registry outlining handling procedures and potential hazards. Each employee is provided with a personal user login to the Simployer system, granting access to the handbooks and their individualized data.

## Our Code of Conduct

Our long-term business success is based on earning the trust and confidence of our customers and other partners. To maintain this trust and confidence, we must ensure that our behavior aligns with the values we stand for. Our Code of Conduct delineates the business ethics that guide our company and the behavior expected of our employees. It encompasses:

- The ethical principles that govern our business operations
- The standards of conduct expected from employees at all levels

The guidelines are intended to support the performance of tasks and decision-making processes.

The Code of Conduct is presented to all employees and approved by the board of directors. It is also available to all employees through the personnel handbook.

## Our whistleblowing policy

We aim to bring any potentially critical issues within the organization to light so that necessary actions can be taken against them.

Therefore, we encourage all employees, customers, business partners and suppliers to report if they discover such issues. To achieve this, we want to ensure that employees at all levels feel safe reporting such issues internally, without facing negative consequences.

All reporting in accordance with this procedure will be considered responsible reporting and thus covered by the whistleblower protection in the Working Environment Act. Reporting to supervisory authorities or other public authorities will also be considered responsible reporting.

The right to report and the protection apply to both our own employees and any hired personnel. We have also established an [external whistleblowing channel](#) which can be found on our website. The whistleblower can choose whether they wish to be anonymous or not. Griptel is dedicated to the continuous improvement of our services. We value and actively encourage feedback from all our customers, as it contributes to our mutual success.

# GRIPtel

## Processes to remediate negative impacts.

To avoid potential escalation and minimize negative consequences to the greatest extent possible, we have appointed a dedicated team to handle external whistleblowing cases and established a robust procedure for follow-up. For internal whistleblowing cases, the person receiving the notification from an employee is responsible for following up and keep the whistleblower informed about the further process.

For external notifications through our website, the whistleblower will immediately and automatically receive confirmation of the submitted notification and be given a unique case number. Provided the whistleblower has not chosen to remain anonymous, they will be contacted by the assigned person in Griptel's team within 3 days.

After investigating the notification further, necessary actions will be taken in accordance with the severity of the notification.

## Our policy for handling requests of information

For any questions regarding this report and its contents, please contact the HR Manager at [anne-cathrine.stene@griptel.com](mailto:anne-cathrine.stene@griptel.com) or the Managing Director, Pål Bjørdal, at [pal.bjordal@griptel.com](mailto:pal.bjordal@griptel.com)

## Risks of negative consequences

Griptel has established due diligence processes to ensure that our suppliers and business partners complies with laws regarding human rights and decent working conditions. The work with the Transparency Act is anchored in the management and board of directors. The board has been involved with and informed of the process and appointed the HR Manager as responsible for the assessments. The risk is assessed in relation to the Norwegian Government Agency for Financial Management's high-risk list.

## About our due diligence procedures

Griptel has established routines for entrenching work on human rights and decent working conditions. In 2023 and 2024, we have evaluated our suppliers that represent 2% or more of our total purchases. Our primary supplier, Gripsteel, began operations in August 2023 and is majority-owned by Griptel. The company is located outside Riga in Latvia. Our previous supplier in Latvia, JAUDA, has unfortunately not responded to our due diligence efforts. However, since we are no longer continuing our purchases with them, we have chosen not to pursue further actions. All other suppliers are located in Norway.

The due diligence checks of suppliers are conducted through Factlines - a Norwegian-owned, independent service provider that is specializing in sustainability and responsible business practices. The process started in 2023. Factlines advises, develops, and produces services with digital support to obtain efficient and verifiable information directly from suppliers and subcontractors.

# GRIPTel

The information gathering from our suppliers is in the form of self-reporting. The questions cover the requirements of the UN Global Compact, the suppliers' chain insights and follow-up practices, in addition to their assessment of the risk associated with violations of ethical guidelines in the relevant production countries. Their answers provide a basis for analysis to determine whether good practices have been established to comply with the Transparency Act and the company's own contractual provisions.

## Results

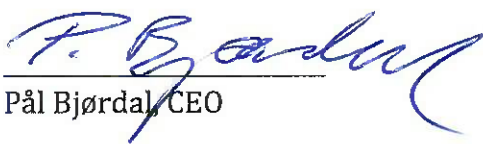
Based on the results of our due diligence, no immediate risks were uncovered. However, our largest supplier, which is partly owned by Griptel, is a new company and does not yet have all policies and routines in place. This is an ongoing effort, and we expect to see different results in the next due diligence assessment. They have however established a comprehensive programme for employee competence development. The learning programme is linked to each employee's salary, meaning that whenever an employee reaches a new competence level, he or she qualifies for a pay rise.

Some of our Norwegian suppliers have not conducted their own due diligence assessment, there could be a risk linked to lack of information of their sub-suppliers.

## Action plan

Griptel will publish our Code of Conduct on our website and distribute it to our suppliers, encouraging them to do the same. We will closely monitor our primary supplier, Gripsteel, to ensure they continue to prioritize sustainability and human rights practices. Additionally, we will conduct a new due diligence process in 2025 to review existing suppliers and evaluate potential new ones.

This report was approved by the board of directors 20<sup>th</sup> of June 2024.



Pål Bjørdal, CEO