



## **Statement on Due Diligence Assessments**

**Etman Distribusjon AS**

**Fossveien 61**

**4373 Egersund**

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## **General Information, Policies, and Procedures**

Etman Group is a reliable supplier of electrical installation materials to the professional electrical industry. We specialize in cost-effective, high-quality solutions within the field of electrical installations. Our strength lies in our extensive expertise, commitment to quality, and reliable delivery, enabling us to offer high-quality electrical materials at competitive prices to the professional electrical industry.

As a dedicated company, we develop, design, and manufacture our own products under the Etman brand, which is available to customers in the Nordic markets. We take pride in offering reliable products that meet industry standards and the needs of our customers.

The Transparency Act serves as a reminder of our responsibility for our supply chain. Our procurement department handles supplier management, and our procurement manager and ESG analyst are responsible for monitoring and coordinating this work. The company's general manager receives reports on progress.

We are well aware that the production of electrical installation products primarily takes place in factories in China and other Asian countries. As in many countries, there can be challenges related to workers' rights in these areas, particularly concerning low wages, forced overtime, misuse of students as labor, and the dismissal of trade union leaders. To minimize human rights risks, we choose to collaborate with reputable manufacturers who have proven their quality over time and export to Western markets.

Etman Group actively safeguards fundamental human rights and ensures decent working conditions both internally and throughout our supply chain. To gain insight into our suppliers' practices, we use online questionnaires based on the OECD Guidelines for Responsible Business Conduct. This is part of the due diligence process required by the Transparency Act. By collecting such information, we take the necessary steps to ensure that our suppliers uphold high standards of ethical



and responsible business practices.

**Our self-reporting covers the following areas:**

- Working conditions and rights
- Indigenous groups and the environment
- Anti-corruption
- Corporate responsibility, strategy, and policies
- Supply chain: monitoring, insight, and control
- Risk and due diligence assessments
- Country risk
- Governance systems within the business

By collecting data, we evaluate whether good practices have been established to comply with the following regulations: the Transparency Act, the Public Procurement Act § 5, and our own contractual terms. Our assessments focus on direct suppliers and manufacturers/production sites, and we gather information about their routines and procedures to ensure compliance throughout the supply chain.

We base our risk assessments of production countries on several sources, including:

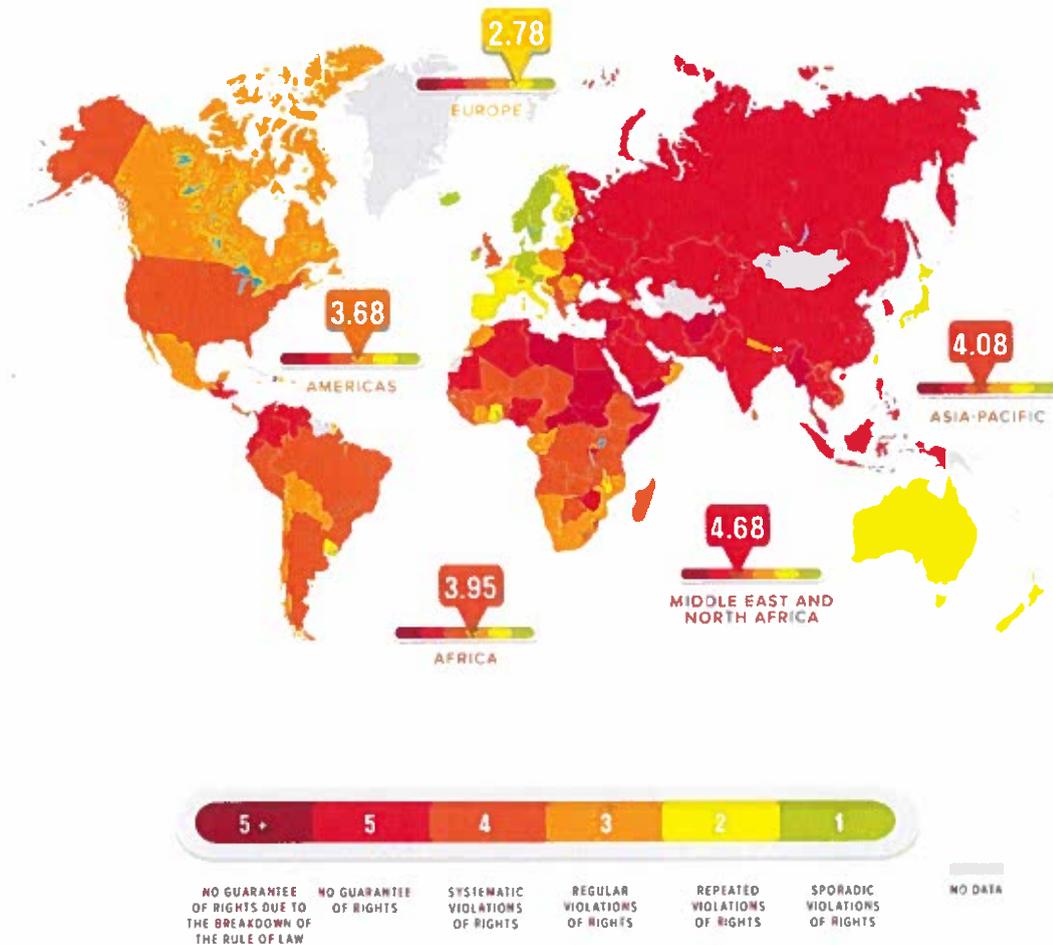
ITUC (The International Trade Union Confederation) for evaluating labor rights, Transparency International (Corruption Index) for assessing corruption risks. Additionally, we map factors related to labor rights, anti-corruption efforts, and whether suppliers have conducted self-reporting, improvement projects, and/or inspections at their production sites.

We also examine whether suppliers have established routines for quality, health and safety, environment, and corporate responsibility. Our suppliers are familiar with our ethical guidelines and must deliver goods and services in accordance with them. They are also required to communicate and enforce these guidelines with their subcontractors.



If self-reporting or other indicators reveal discrepancies, we follow up with the relevant supplier. The goal is to prevent and reduce negative impacts by collaborating with the supplier and other actors in the supply chain.

## 2025 GLOBAL RIGHTS INDEX



Source: ITUC LinkedIn

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## Findings from Our Due Diligence Assessments

Out of the suppliers we contacted, 72% responded to our inquiry. Among these suppliers, we identified:

17 companies with "low risk"

1 company with "medium risk"

0 companies with "high risk"

Etman calculates supplier risk scores through a structured due diligence process. First, surveys are sent to our top suppliers to collect information on their practices. Each response is then evaluated and assigned a risk score from 1 to 5. A score of 1 indicates no significant risk and reflects that the company has strong policies, certifications, and transparent management practices, while a score of 5 indicates a very high level of risk related to specific ethical issues. The scores from all questions are averaged to determine the supplier's overall ESG risk level. If the average score falls between 1 and 2, the supplier is considered low risk, meaning the company demonstrates strong policies, certifications, and good transparency. An average score between 2.1 and 3 indicates medium risk, suggesting that there are some gaps in ESG practices. Scores between 3.1 and 5 indicate high risk, meaning the supplier may have significant ethical weaknesses or serious concerns. Based on this classification, Etman applies different follow-up measures: low-risk suppliers are monitored through normal annual review, medium-risk suppliers are requested to provide an improvement plan, and high-risk suppliers are subject to corrective actions, with possible disengagement in the most serious cases.

It is worth noting that some of our suppliers operate in countries with a particularly high risk of human rights and labor rights violations. Additionally, we work with some smaller suppliers who are not subject to the regulations of the Transparency Act.

## Implemented Measures



In the event of discrepancies, we assess follow-up proposals and actions for our suppliers, based on their self-reporting. In total, we will follow up with 1 supplier. Information about this and related actions is recorded in our company's internal HSE system Sticos.

### **Planned Measures**

Etman Group has an ongoing commitment to conducting due diligence assessments and self-reporting among our suppliers. We want all suppliers that we consider active to respond to self-reporting, and we hope to receive positive feedback from these suppliers.

To ensure thorough follow-up, we will continue to adhere to our annual cycle, based on the OECD Guidelines for Responsible Business Conduct. Increased participation will give us better insight and allow us to take necessary measures if needed.

We will continue to follow up on questions in the current system and beyond. Additionally, we will request extra information from suppliers operating in high-risk countries to gain a deeper understanding of the situation and manage potential risks effectively.

Egersund, March 5, 2026

ESG Analyst

A handwritten signature in blue ink, appearing to read "Knut Høyland".

  
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