Version no.:1	Approved by: Kjetil Vikingstad
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## Geminor Statement under the Transparency Act

This report relates to Geminor AS (herein Geminor), a subsidiary of Geminor Invest AS. Geminor provides services in waste treatment, logistics, material recycling, and waste for energy production. We handle over 1.8 million tons of waste annually, with an annual turnover of approximately 1.9 Billion NOK.

Founded in Karmøy, Norway, in 1994, the company now has offices and treatment facilities in eight different countries (France, UK, Germany, Italy, Poland, Denmark, Sweden, Finland, and Norway), employing a total of around 100 professionals and experts. Geminor holds contracts with around 360 waste producers and 260 incineration and recycling plants. Organizationally, each country has a country manager who reports directly to the CEO. The CEO holds indirect ownership of Geminor AS of 85,85% and does not sit on the board. The board consists of three members, the chairman of the board being Truls Gautesen. The Chief Financial Officer (CFO), Chief Digital Officer (CDO), and Chief Quality Officer (CQO) all report directly to the CEO. The CFO manages the finance and HR departments, the CDO; all software development, and the CQO; the QHSE department, and ESG which are all managed at a group level to support each country manager.

Sustainability and transparency are at the core of Geminor's operations. We are committed to carrying out business following the UN OECD guidelines for responsible business conduct and have detailed our commitments to human rights and sustainability in our Standard Code of Conduct. Here, we clearly state our commitment to conducting our business consistently with the United Nations Guiding Principles on Business and Human Rights, The European Convention on Human Rights, and the United Nations Convention on the Rights of the Child. We also consider the conventions of the International Labour Organization (ILO Conventions). Geminor has further established policies to prevent modern slavery, promote equality, and via the whistle-blower policy, assist persons who believe they have discovered malpractice or impropriety.

In addition to the above, Geminor carries out due diligence under section 4 of the act by updating and reviewing the policies annually, signed off by the chairman of the board and the CEO. All employees have mandatory e-learning to ensure awareness and understanding of each policy and from 2023 onwards, will need to renew this training annually. Geminor has ISO certifications ISO14001:2015, ISO 9001:2015, and ISO 45001:2018. A new Geminor Supplier Code of Conduct will be implemented in all company agreements as of June 30<sup>th,</sup> 2023. Geminor has mapped its suppliers and business partners in order to continually assess risks related to decent working conditions, fundamental human rights, and the environment. High-risk suppliers have been identified and listed for auditing under our updated annual auditing plan. Recent certifications under the Forest Stewardship Council Chain of Custody certificate (FSC CoC) and RED2 Certificate are highlighting new areas for managing quality and due diligence in human rights and sustainability.

At Geminor, we are constantly striving to improve our systems to manage the traceability of our waste streams and decent working conditions within its value chain. An annual sustainability report is released in the final quarter of each year. From 2023 this will include materiality assessment requiring risks, impacts, and opportunities of Environment, Social, and Government topics by the upcoming Corporate Social Responsibility Directive (CSRD). This takes our commitment to the Transparency Act one step further, by assessing upstream and downstream risks.



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## Geminor Statement under the Transparency Act

Geminor will carry out due diligence under section seven of the Transparency Act – request for information. Should any information be required to this end, please email our Sustainability Manager or our QHSE team.



Dette dokumentet er signert av:

Truls Gautesen	0: 4 00 00 0000 00 50
	Signert: 28.06.2023 09.56
Huis Gautesen	01011011. 20.00.2020 00.00

10.08.1949 Signert med BankID

Kjetil Vikingstad Signert: 27.06.2023 15.58

18.03.1971 Signert med BankID

Du kan bruke denne linken for å verifisere signaturen på dokumentet og sjekke at dokumentet ikke er endret etter at det ble signert: <a href="https://brd.no/signing/validate">https://brd.no/signing/validate</a>

