

# NEXTRON AS' ROUTINE FOR ANCHORING THE WORK UNDER THE TRANSPARENCY ACT

## 1. INTRODUCTION

The purpose of the Transparency Act is to promote businesses' respect for basic human rights and decent working conditions in connection with the production of goods and the provision of services.

In addition, the Transparency Act must ensure the public has access to information about how businesses handle negative consequences for basic human rights and decent working conditions.

This routine explains how Nextron AS ("Nextron") anchors and works with due diligence assessments in line with the provisions of the Transparency Act.

## 2. ANCHORING

The board adopts Nextron's routines for the work to be carried out. The board decides on the placement of responsibility for the work to be carried out in order to fulfill the requirements of the Transparency Act.

## 3. THE BOARD'S REVIEW AND AUDIT

Nextron's board must review the company's routines regularly. It is the general manager who plans for this, and who presents the routines and any changes to these to the board.

The CEO shall once a year review the work Nextron has carried out, discoveries made, measures implemented etc. The annual review is a briefing matter for the board.

The managing director must himself assess whether there is a need for the board's consideration of matters related to the Transparency Act beyond the annual review.

# 4. ANNUAL STATEMENT/REPORT

The board approves the annual report on Nextron's due diligence assessments and the results of these, including its publication. The deadline for publication is at the same time as the company's annual report, and no later than 30 June each year.

## 5. THE DILIGENCE ASSESSMENTS

Nextron must annually carry out due diligence assessments relating to our activity. This means that we must carry out investigations that are reasonable and relevant in order for us to



uncover possible consequences of or risks of violations of basic human rights or decent working conditions.

The due diligence assessments must be carried out for our own activity, our suppliers' activity and our business partners' activity.

Due diligence assessments must be carried out for all of our products and services.

## 6. POSSIBLE MEASURES

Findings through the due diligence assessments shall lead to an assessment of measures that may be relevant to implement. The measures must be suitable to prevent actual violations of basic human rights or decent working conditions or to reduce the risk of violations taking place.

The effect of the measures must be evaluated.

# 7. NOTIFICATION CHANNELS

Nextron has established a system for reporting violations of basic human rights and decent working conditions. The system must give its own employees, suppliers and business partners' employees and the general public the opportunity to notify.

# 8. INFORMATION AND COURSES

Nextron must ensure that information about our work in line with the Openness Act is available to its own employees, suppliers and business partners' employees and the general public. The information must be adapted to external actors and own employees.

Nextron must regularly train its own employees in the Transparency Act and the company's routines and work in line with the Act. Participation must be documented.

Fornebu/San Luis de Sabinillas, 21. juni 2023	
Carl Henrik Sibbern (sign) Chairperson	Kim Nicolai Strømsborg (sign) Board member
Geir Elstad (sign) CEO and board members	