

## Transparency Act – Due Diligence Assessments in the Supply Chain

On the 1<sup>st</sup> of July 2022, the Norwegian Transparency Act (“**Transparency Act**”) came into force. The Transparency Act aims to increase companies’ respect for fundamental human rights and decent working conditions in connection with their supply chains and ensure public access to information regarding how companies address adverse impacts on human rights and working conditions.

The Transparency Act, therefore, requires companies to regularly:

1. Carry out due diligence according to the OECD Guidelines for Multinational Enterprises
2. Account for the due diligence as part of their reporting
3. Ensure public access to information upon written request.

Stadler Service Norway AS is subject to the Transparency Act cf. sections 2 and 3.

### 1. Organisational Structure and Supply Chains of Stadler Service Norway AS

Stadler Service Norway AS is part of the global Stadler Group, headquartered in Switzerland. The company specializes in maintaining and servicing trains and trams in Norway. The range of services includes preventive maintenance, vehicle repairs and overhauls, as well as the implementation of modern technological solutions to enhance operational performance and reliability.

Stadler Service Norway AS is active at five locations: Oslo, Drammen, Bergen, Skien and Trondheim. About 130 employees are currently working in the company.

The company is working with global suppliers who provide, among others, materials, specific components, IT, communications equipment and services, and maintenance services.

### 2. The Duty to Carry out Due Diligence – Our Values, Policies and Procedures

Stadler Service Norway AS is committed to fair and cooperative business relations as well as to social and ecological sustainability. Moreover, Stadler explicitly acknowledges and respects universal human rights, as defined by the UN’s Universal Declaration of Human Rights, and aims to carry out its business with due diligence to protect human rights throughout its entire supply chain.

These expectations are reflected and described in the Code of Conduct for Stadler employees and in the Code of Conduct for our Business Partners. The Code of Conduct is based on the principles of international standards, such as the OECD Guidelines, the ILO Conventions, and the ICESCR, as well as country-specific laws and regulations. It reflects the fundamental values of Stadler Service Norway AS: integrity, legality, and ethical behaviour.

The company is fully aware of its responsibilities connected to the global development and potential negative side effects in terms of human rights and environmental impact. Stadler Service Norway AS

has implemented the preventional targets in the company's philosophy and started to deepen the due diligence procedures regarding its business partners and supply chain. Specific questions have been added to the questionnaire associated with the selection and approval of suppliers.

To identify and assess actual and potential adverse impacts on human rights and working conditions that are either indirectly or directly linked to Stadler Service Norway AS, the supply chain has been mapped. In addition, it is currently being assessed with regard to the risks of exploitation, poor working conditions, harmful environmental influences, discrimination, child labor, corruption and other negative impacts. In the event of a significantly increased risk, specific measures such as further investigations, requests for statements, possible on-site clarifications and others will be defined and implemented. During the assessment, suppliers with the biggest turnover are prioritized.

Information about respective conclusions and measures that might need to be taken to cease, prevent, or mitigate adverse impacts based on our assessment, will be communicated with the next update of the report (cf. section 3 hereinafter).

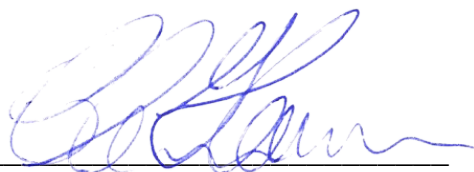
### 3. The Duty to Account for Due Diligence – Our Reporting

Stadler Group regularly publishes easily accessible financial and non-financial reports, including sustainability reports, on the 'Investor Relations' section of their website ([Investor Relations](#)). The most recent sustainability report from Stadler Group includes a materiality analysis and a dedicated section on human rights. Additionally, Stadler Service Norway AS's annual report will indicate, where information regarding the local reporting can be accessed.

### 4. Right to Information – Our Communication

Stadler Service Norway AS acknowledges the public's right to information regarding adverse impacts on fundamental human rights cf. section 6 of the Transparency Act. Stadler Group has established a process for receiving and managing complaints and reports, which can also be used for written information requests related to the Transparency Act. The process is accessible on the 'Compliance' section of Stadler's website ([Compliance](#)).

Oslo, 1.12.2023



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