

STATEMENT FOR SUBMET ENTREPRENØR AS org. 922 114 137

Explanation

SUBMET ENTREPRENØR AS has committed us to conduct our business in accordance with the UN's guiding principles for business and human rights. We respect all internationally recognized human rights, including those enshrined in the Universal Declaration of Human Rights, the UN Convention on Civil and Political Rights, the UN Convention on Economic, Social and Cultural Rights, the International Labor Organization's (ILO), Declaration on Fundamental Principles and Rights in working life and current standards within international humanitarian law.

This report is based on due diligence assessments carried out in the period from June 30, 2023, to May 23, 2024. Our aim with this work is to ensure a transparent, ethical, and sustainable supply chain. By evaluating our suppliers based on the OECD guidelines, we seek to identify and mitigate potential risks related to human rights, employment practices, environmental impact. This comprehensive approach helps us uphold our commitment to high ethical standards and fosters trust and accountability throughout our supply chain and following the law transparency act (åpenhetsloven).

General information

SUBMET ENTREPRENØR AS is organized with head office in Norway.
SUBMET ENTREPRENØR AS is a supplier of construction and infrastructure, which are offered to customers in the business market in Norway

Our operations are covered by the Transparency Act and we therefore regularly carry out due diligence assessments by surveying human rights and working conditions in our value chain, including suppliers and other business partners.

By mapping the value chain, it will give us an overview of whether there is or is a risk that human rights violations or indecent working conditions may occur. By carrying out due diligence assessments, we can stop, prevent or limit negative consequences that can be linked directly or indirectly to our business. The work on the due diligence assessments was approved 14.06.2024, and it is the board of SUBMET ENTREPRENØR AS that is responsible for ensuring that the business complies with the current requirements of the Transparency Act.

This report consists of an assessment of our own operations and our value chain. All our suppliers are obliged to answer our questions in connection with the survey, and all our suppliers must sign a cooperation agreement and approve our ethical guidelines. If our suppliers do not comply with our ethical guidelines, SUBMET ENTREPRENØR AS must follow up with the supplier, if no improvements occur, SUBMET ENTREPRENØR AS can terminate cooperation with the supplier.

Other measures:

Our mapping

In our work with due diligence assessment, we have adopted Transparency Gate. Via this solution, individuals can request information about our products/services and suppliers. This is called information requirements.

We carry out assessments of all our suppliers one time in the year. Based on your feedback, we can uncover risks and set up measures to reduce risks or remove negative consequences. The measures are followed up, to see if suppliers meet our requirements. SUBMET ENTREPRENØR AS has the option to terminate all cooperation with suppliers who do not comply with our requirements. Via this solution, all our suppliers and partners can also respond to our survey

Information requirements

Anyone can request information about our business and value chain. People can request information anonymously or by name, and everyone must receive feedback within 21 days.

Link for our TransparencyGate portal: <https://portal.transparencygate.com/tg/submet-entreprenor-as/JaMzTlqd2nQrso7y.10779?lang=no>

Report relationship

Anyone can report conditions that contravene human rights and decent working conditions, and we will investigate reports that come in to see if any violations have occurred.

Link for our TransparencyGate portal: <https://portal.transparencygate.com/tg/submet-entreprenor-as/JaMzTlqd2nQrso7y.10779?lang=no>

Negative consequences and risks

In our ongoing efforts to map risks, we have identified and evaluated 17 suppliers and partners. However, only 8 of them have responded to the questionnaire we sent via TransparencyGate. Improving this response rate will be a key focus for next year's assessment.

The report below provides detailed insights into the risks associated with each supplier. Additionally, we have gathered information on potential negative consequences, which is illustrated in the accompanying image showing the distribution and scale of these risks.

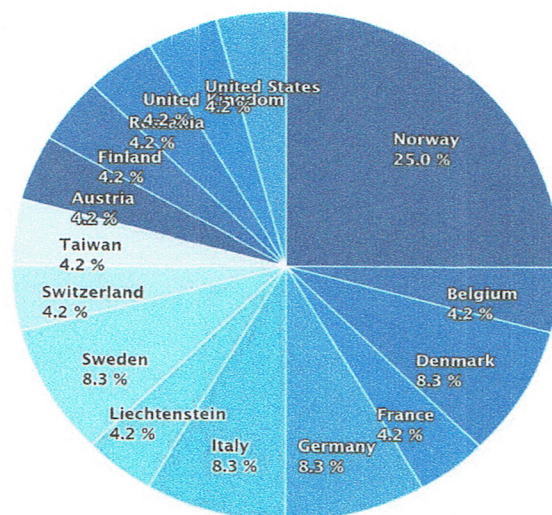
We are committed to increasing engagement and compliance among our suppliers to ensure a thorough and accurate risk assessment. By doing so, we aim to enhance our overall supply chain transparency and mitigate potential risks more effectively.

Our findings

Locations of Our Suppliers and Their Facilities:

We have collected data from 8 out of our 17 suppliers regarding their base locations and the locations of their facilities. Understanding where our suppliers are based and where their operations are located is crucial for our risk assessment and due diligence processes. This information helps us to evaluate potential risks and ensure compliance with our standards across different regions. It also allows us to better understand the geographical distribution of our supply chain and address any region-specific challenges that may arise.

Category	Number
Norway	6
Belgium	1
Denmark	2
France	1
Germany	2
Italy	2
Liechtenstein	1
Sweden	2
Switzerland	1
Taiwan	1
Austria	1
Finland	1
Romania	1
United Kingdom	1
United States	1



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Six of the suppliers purchase from Norway. Additionally, SUBMET ENTREPRENØR AS has a supplier that buys from Romania. Look at the risk report from TransparencyGate below.

In our assessment of supplier locations, we have identified the countries where our suppliers operate. Here is a breakdown of our findings:

- **Norway:** 6 suppliers
 - Six of our suppliers are based in Norway, indicating a significant portion of our supply chain operates within the country. This domestic presence allows for closer monitoring and potentially lower logistical risks.
- **Belgium:** 1 supplier
 - One supplier is based in Belgium, contributing to our supply chain diversity within the European Union.
- **Denmark:** 2 suppliers
 - Two suppliers operate in Denmark, which enhances our network within Scandinavia.
- **France:** 1 supplier
 - One supplier is located in France, adding to our Western European connections.
- **Germany:** 2 suppliers
 - Two suppliers are based in Germany, a key industrial hub in Europe.
- **Italy:** 2 suppliers
 - Two suppliers are from Italy
- **Liechtenstein:** 1 supplier
 - One supplier is from Liechtenstein, a unique addition due to the country's strong financial and regulatory framework.
- **Sweden:** 2 suppliers
 - Two suppliers operate in Sweden, further supporting our Scandinavian supply chain network.
- **Switzerland:** 1 supplier
 - One supplier is based in Switzerland, known for its high-quality standards and robust economic environment.
- **Taiwan:** 1 supplier
 - One supplier operates in Taiwan
- **Austria:** 1 supplier
 - One supplier is based in Austria, adding to our Central European supply chain.
- **Finland:** 1 supplier
 - One supplier is from Finland
- **Romania:** 1 supplier
 - One supplier is based in Romania.
- **United Kingdom:** 1 supplier
 - One supplier operates in the United Kingdom
- **United States:** 1 supplier
 - One supplier is based in the United States

Conclusion: Our suppliers are well-distributed across several key regions, with a significant concentration in Norway and a balanced presence in other European countries,

Overview of 8 suppliers and the scores of each category:

Name	Overview	Human rights	Employment	Environment & Climate	Combat bribery	Consumer interests	Tax & competition	Total Score	Total Due Diligence
Supplier 1	4.53	4.58	5	5	4.92	5	5	4.86	100 %
Supplier 2	3.38	0	0	0	0	0	0	0.48	28 %
Supplier 3	4.81	4.91	5	0	0	0	0	2.1	53 %
Supplier 4	5	4.82	5	5	5	4.78	5	4.94	86 %
Supplier 5	4.77	4.5	4.92	2.36	5	5	5	4.51	91 %
Supplier 6	5	5	5	5	4.92	5	5	4.99	95 %
Supplier 7	5	4.91	5	5	5	5	5	4.99	95 %
Supplier 8	5	5	5	5	5	5	5	5	95 %

In our ongoing effort to ensure a responsible and ethical supply chain, we have conducted a detailed analysis of our suppliers. Here is an excerpt from our findings, focusing on Supplier 1 and 6:

Supplier 1:

- **Total Score:** 4.86
- **Total Due Diligence:** 100%
- **Overview:** Supplier 1 has demonstrated exceptional compliance across all evaluated categories, achieving a near-perfect overall score. This supplier's commitment to ethical practices is evident in their comprehensive approach to human rights, employment, environmental sustainability, anti-bribery measures, consumer interests, and tax and competition policies.
- **Human Rights:** 4.53 Supplier 1 has shown a strong commitment to protecting human rights, scoring 4.53 in this category. Their policies and practices ensure fair treatment and respect for all individuals involved in their operations.

- **Employment:** 4.58 With a score of 4.58, Supplier 1 excels in employment standards, providing a safe and equitable work environment for their employees.
- **Environment & Climate:** 5 Achieving a perfect score in Environment & Climate, Supplier 1 has implemented robust measures to minimize their environmental impact and promote sustainability.
- **Combat Bribery:** 4.92 Scoring 4.92 in combating bribery, Supplier 1 has strong anti-corruption policies and practices in place, ensuring integrity in all their dealings.
- **Consumer Interests:** 5 Supplier 1 prioritizes consumer interests, reflected in their perfect score in this category. They are committed to delivering products and services that meet high standards of quality and safety.
- **Tax & Competition:** 5 With a perfect score in tax and competition, Supplier 1 demonstrates compliance with all relevant laws and regulations, promoting fair competition and transparency in their financial practices.

Conclusion: Supplier 1 sets a high standard for our supply chain, with exemplary performance across all categories. Their commitment to ethical practices and comprehensive due diligence makes them a model partner. As we move forward, we aim to encourage all our suppliers to achieve similar levels of compliance and excellence.

Next Steps: We will continue to work with our suppliers to improve response rates to our questionnaires and enhance overall compliance. Suppliers with lower scores, such as those scoring below 50% in Due Diligence, will be prioritized for follow-up to address any gaps and ensure alignment with our standards.

Supplier 6:

- **Total Score:** 4.99
- **Total Due Diligence:** 95%
- **Overview:** Supplier 6 has demonstrated outstanding compliance across all evaluated categories, achieving an almost perfect overall score. This supplier's commitment to ethical practices is evident in their comprehensive approach to human rights, employment, environmental sustainability, anti-bribery measures, consumer interests, and tax and competition policies.
- **Human Rights:** 5 Supplier 6 has shown a strong commitment to protecting human rights, achieving a perfect score of 5. Their policies and practices ensure fair treatment and respect for all individuals involved in their operations.
- **Employment:** 5 With a perfect score of 5 in employment, Supplier 6 excels in providing a safe and equitable work environment for their employees.
- **Environment & Climate:** 5 Achieving a perfect score in Environment & Climate, Supplier 6 has implemented robust measures to minimize their environmental impact and promote sustainability.
- **Combat Bribery:** 4.92 Scoring 4.92 in combating bribery, Supplier 6 has strong anti-corruption policies and practices in place, ensuring integrity in all their dealings.
- **Consumer Interests:** 5 Supplier 6 prioritizes consumer interests, reflected in their perfect score in this category. They are committed to delivering products and services that meet high standards of quality and safety.

- **Tax & Competition:** 5 With a perfect score in tax and competition, Supplier 6 demonstrates compliance with all relevant laws and regulations, promoting fair competition and transparency in their financial practices.

Conclusion: Supplier 6 sets a high standard for our supply chain, with exemplary performance across all categories. Their commitment to ethical practices and comprehensive due diligence makes them a model partner. As we move forward, we aim to encourage all our suppliers to achieve similar levels of compliance and excellence.

Next Steps: We will continue to work with our suppliers to improve response rates to our questionnaires and enhance overall compliance. Suppliers with lower scores, such as those scoring below 50% in Due Diligence, will be prioritized for follow-up to address any gaps and ensure alignment with our standards.

One of our suppliers (Supplier 5 on the sheet) received a low score in the Environment & Climate category. After investigating, we found that this supplier does not produce physical goods, which explains why they have no significant impact on the climate.

The supplier with the highest risk according to the TransparencyGate score is Supplier 7, with a total score of 8.53. In response to the question, “Where is your company based and where are your production facilities located?” they listed Austria, Denmark, Finland, Germany, Italy, Norway, Romania, Sweden, the United Kingdom, and the United States. Please see the report below for more details on the score and its implications.

The supplier with the lowest score from TransparencyGate-Score (Supplier 5)

Country	Democracy Index	Civil Liberties	Corruption	Ecological footprint	Unemployment rate %	Gender equality %
Austria	8.2	1	7.1	6.1	4.7	46.7
Denmark	9.3	1	9	6.7	4.2	47.1
Finland	9.3	1	8.7	6.4	6.8	48.5
Germany	8.8	1	7.9	4.7	3	46.7
Italy	7.7	1	5.6	4.3	8.1	42.8
Norway	9.8	1	8.4	5.7	3.2	48.8
Romania	6.5	2.5	4.6	3.6	5.4	42.4
Sweden	9.5	1	8.3	6.3	7.4	47.4
United Kingdom	8.3	1	7.3	4.2	3.6	47.9
United States	7.9	2.5	6.9	8.1	3.6	46.4
Risk Sum				8.53		

The supplier with the highest score from TransparencyGate-Score: (Supplier 8)

Country	Democracy Index	Civil Liberties	Corruption	Ecological footprint	Unemployment rate %	Gender equality %
 Norway	9.8	1	8.4	5.7	3.2	48.8

What does this mean?

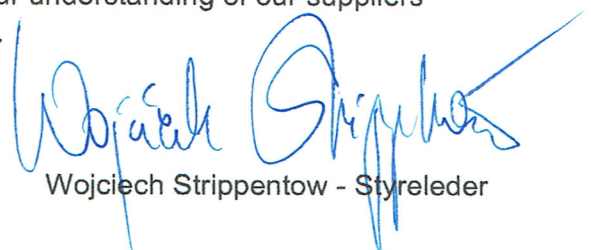
Factor	Scale/Range	Description	Source
Democracy Index	0 – Autocratic, 10 – Strong Democracy	The democracy index is based on surveys assessing 60 different statements related to: electoral processes and pluralism, the functioning of government, civil liberties, political participation and political culture.	Democracy Index 2021
Civil Rights	1 – Strong Civil Rights, 10 – Weak Civil Rights	The statistics are built on a checklist of questions related to civil rights, such as freedom of speech, freedom of assembly, the right to organization, and religious freedom.	Freedom House Report
Corruption	0 – Very Corrupt, 10 – Not at all corrupt	The indicator encompasses corruption in the public sector (e.g., police, education, healthcare) and in politics.	Transparency International - CPI 2020
Ecological Footprint	Below 1.6 – Satisfactory, Above 1.6 – Unsatisfactory	The indicator is based on the premise that every person on Earth has a designated amount of resources available, calculated to be 1.6 hectares per person. If a country's ecological footprint is 6.4 hectares per person, the inhabitants require four times more resources than our planet can regenerate and absorb into the atmosphere.	Global Footprint Network

Unemployment	Percentage	Unemployment here refers to the percentage of the total labor force that are unemployed but available and actively seeking employment.	UN Statistics - Unemployment
Gender Equality in the Workforce	Percentage	This indicator measures gender equality in the workplace, specifically focusing on the proportion of women in the total labor force aged 15 and older who are engaged in paid employment. It thereby provides insights into the extent of women's participation in the formal workforce.	ILO

Our measures

- **Measures taken:** We have made an effort to map every supplier in our value chain. So far, eight of the suppliers have completed our questionnaire based on OECD guidelines. We've discovered that one supplier's value chain has a location in Romania. However, most of our suppliers are based in Norway. We do not view this as a significant risk factor since they do not buy or sell physical goods from Romania.
- **Planned measures:** Out of 17 suppliers, eight have responded to the questionnaire. We will follow up with those who have not yet responded. Additionally, we will focus on suppliers with a Due Diligence Score below 50%, ensuring they meet our standards.
- **Result of measures:** All of our suppliers have a risk score above 9 according to the TransparencyGate Score. Among them, six suppliers have achieved a Due Diligence Score over 90%, demonstrating strong compliance with our standards. However, two suppliers have a Due Diligence Score below 50%, indicating areas that need significant improvement. We will prioritize follow-up actions with these lower-scoring suppliers to ensure they meet our compliance expectations.
- **As a minimum:** Our goal is to have 70% of our suppliers complete our questionnaire. This will help us ensure that the majority of our supply chain aligns with our standards and guidelines. By gathering this information, we can better assess and improve our overall compliance and risk management. We believe that achieving this target will significantly enhance our understanding of our suppliers' practices and commitment to our shared values.

Oslo 14.06.2024



Wojciech Strippentow - Styreleder