

Revised statement of Due Diligence Assessment

Kople AS - June 2024

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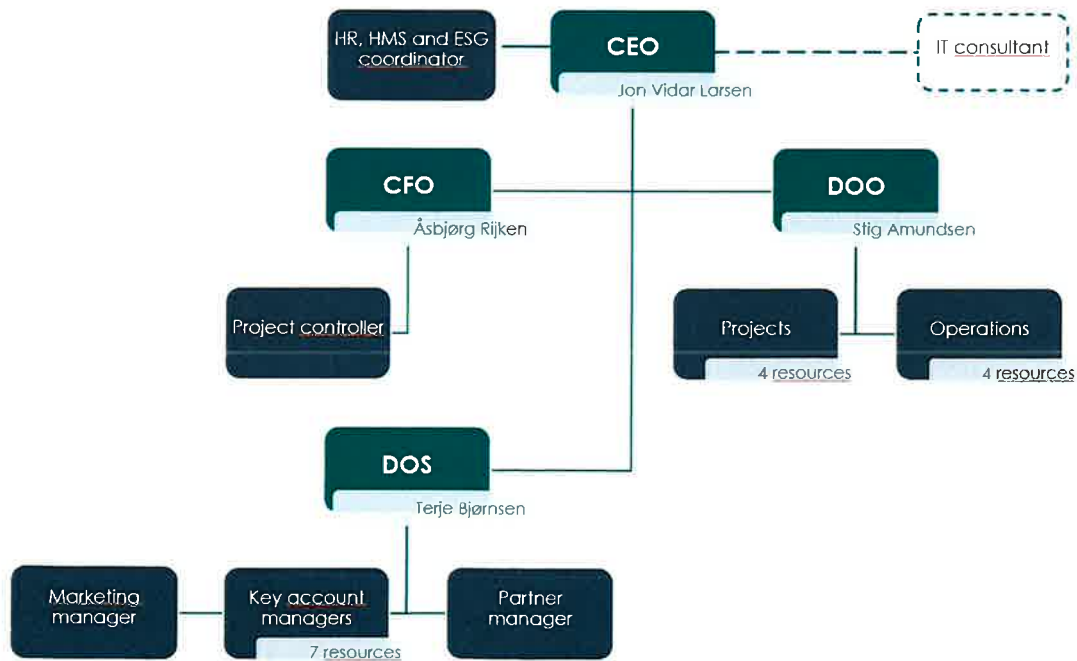
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Descriptions of Kople ASs Organization and Operations

Koples vision: We aim to be a leading charging operator in the Nordic market.

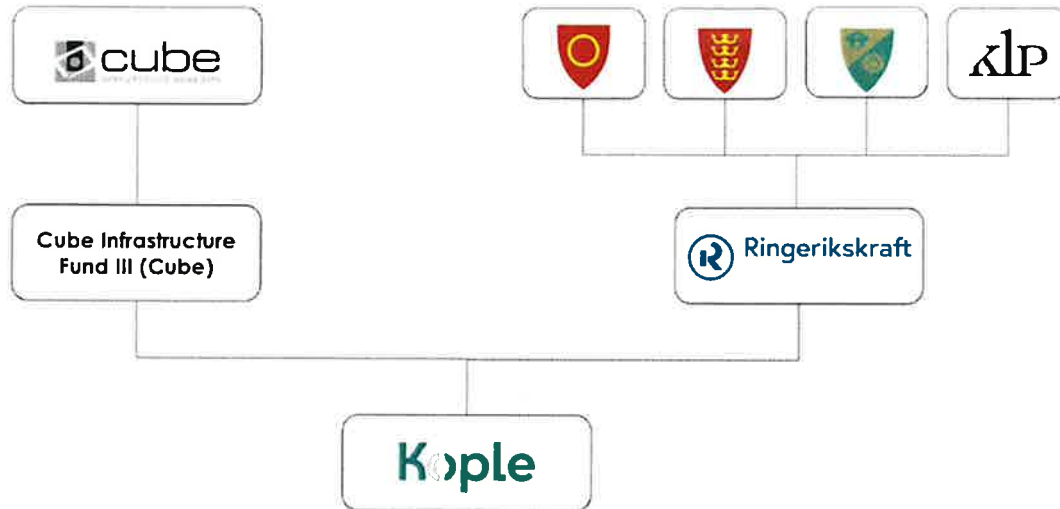
Koples mision: We build and operat infrastructure that enables the green transition.

Organizationchart pr june 2024



We are part of organized labor and are affiliated with the Confederation of Norwegian Enterprise (NHO), the Norwegian Society of Engineers and Technologists (NITO), and we are members of the Norwegian Electric Vehicle Association..

Kople is owned by Cube Infrastructure and Ringerikskraft:



Operating Area

The company's business area involves the establishment and operation of electric vehicle charging stations. We provide customized charging facilities for electric vehicles at destinations, commercial buildings, retail outlets, and municipalities throughout Norway.

Kople is involved throughout the entire process, from planning to installation, operation, and support.

For installation and construction, we use selected contractors.

Procedures/Guidelines

Our work with the Transparency Act is coordinated within our company and integrated into our Management System. The Management System is structured according to the standards NS-EN ISO 9001:2015 and NS ISO 45001:2018:

Ledelsessystemets oppbygging

Nivå 1. Systemets styringsdokumenter

Nivå 2. Prosedyrer og beskrivelser

Nivå 3. Sjekklistene og skjema

A = Kvalitet

B = Arbeidsmiljø og HMS

C = Ansatte og organisasjon

D = Det ytre miljø

XXX= Dokumentnummer/løpenummer

A-N = Revisjonsbetegnelse



Our Policies and Guidelines are Anchored with our Management team.

The entire organization is familiar with our management system and understands that it governs our business operations. This includes compliance with the Transparency Act and proactive measures in relation to due diligence assessments of our suppliers. This is to uncover potential risks or actual violations of human rights and decent working conditions.

The management system at Kople is dynamic, and we conduct ongoing reviews.

Before entering into an agreement with a supplier, the following procedure must be followed:

Procedure for Procurement of Goods and Services

1. Supplier Code of Conduct Assessment
 - a. The supplier must confirm whether they have a "Supplier Code of Conduct" as part of their contract terms with their suppliers.
 - b. The supplier must confirm their adherence to our ethical guidelines and requirements for our suppliers.
2. Evaluation Criteria
 - a. The supplier's adherence to a Supplier Code of Conduct and our ethical guidelines will be evaluated during the procurement process.
3. Approval Process
 - a. Approval of the supplier will be contingent upon their compliance with the above criteria.

Koples Ethical Guidelines

Ethical Business Conduct – Our Relationship with the World

- At Kople, we uphold high ethical standards in conducting all aspects of our business. This requires honesty and fairness in all dealings related to business operations.
- These guidelines establish the framework for how employees interact with the community and with each other.
- Kople adheres to the core conventions of the International Labour Organization (ILO) as the foundation of our operations, and we respect the United Nations' human rights and workers' rights.

[Policy – Due diligence Suppliers](#) [Requirements for suppliers](#)

Due Diligence Assessments are conducted in a four-step process:

1. Self-declaration facilitated by Supplier/Purchasing Manager
 - The supplier or purchasing manager provides a self-declaration.
2. Sending of a FORMS form for Due Diligence Assessment in connection with the Transparency Act
 - The supplier is sent a FORMS schema form for the Due Diligence Assessment required by the Transparency Act.
3. Due Diligence Assessment of the Supplier based on the FORMS form response
 - If risks or actual violations are identified:
 - Immediate actions are implemented.
 - Follow-up measures that are initiated.
 - If no issues or risks are identified:
 - Regular monitoring continues.
4. Annual Supplier Follow-up
 - Annual follow-up of suppliers is conducted.

This process ensures that Kople systematically assesses suppliers' compliance with ethical and legal standards, including human rights and decent working conditions, as required by the Transparency Act.

Results of Due Diligence Assessments

(§5b) Information on actual negative consequences and significant risks of negative consequences identified through the company's due diligence assessments.

During the reporting year, work has commenced on mapping our supplier chain in relation to actual negative consequences and significant risks of negative consequences, and assessing necessary measures where deemed necessary. Each supplier manager is monitoring their portfolio, obtaining necessary information, and updating due diligence assessments for further action.

A quarterly review of the entire supplier portfolio is conducted.

The risk factors we consider include:

- Country risk - ITUC GRI - Home (globalrightsindex.org)
- Product risk - Procurement high-risk list
- Respect and Corporate Responsibility for Fundamental Human Rights

Information has been received from suppliers of electric vehicle chargers indicating that within their supply chains, there have been actual negative consequences and significant risks of violations of human rights and decent working conditions. This primarily relates to the extraction of raw materials, minerals, and material production.

Information on Measures Implemented or Planned

(§5c) Information on measures that the company has implemented or plans to implement to stop actual negative consequences or limit significant risks of negative consequences, and the results or expected results of these measures..

Kople's suppliers can be broadly categorized into product suppliers and service providers. Our product suppliers are companies located in Norway and Europe. We collaborate closely with the largest product suppliers.

All our significant suppliers have committed to adhering to our Requirements for Supplier/Supplier Code of Conduct, which includes requirements for orderly working conditions, respect for human rights, ethics, and the environment. Kople will not engage with a supplier that does not commit to these standards.

We particularly monitor our suppliers of electric vehicle chargers to ensure they follow through on the actions and plans they have stated to avoid human rights violations and decent working conditions in their supply chains. See Findings below

We always evaluate alternative suppliers when purchasing products and services. This is to ensure that we collaborate with suppliers who focus on their supply chain's fundamental human rights and decent working conditions.

Moving forward, we will continue to maintain a high focus on suppliers of electric vehicle chargers. We will collaborate with those who prove to be most suitable and demonstrate the highest level of responsibility, follow-up, and documentation of their efforts to monitor their supply chain.

This has been specifically communicated within our project department, which designs our charging locations and selects electric vehicle chargers for these sites.

We expect that our measures will increase awareness within our organization to choose the "right" suppliers, that we will identify risks of violations of the purposes the Transparency Act aims to safeguard, and that existing suppliers will maintain their efforts to ensure their own supply chains.

This statement outlines the proactive measures and ongoing commitment of Kople to ensure that its suppliers uphold fundamental human rights and decent working conditions in their supply chains.

Findings

Norfax: "Over the next year, we will follow up on all our suppliers above NOK 100,000 through email or visits, focusing on the requirements of the Transparency Act and transparency of subcontractors and their compliance with the rights outlined in the Code of Conduct. We are also working on EPD - Environmental Product Declaration, which will also visualize the supply chain for our component partners."

"We also prioritize suppliers who have environmental certification for their company and processes, and they must be based in Europe.»

Siemens: "Audit plans are defined for a year at a time, including on site control of suppliers. Our governing procedures are also subject for updating in case of change in laws, and based on experience from auditing."

Tritium: Active HSE (Health, Safety, and Environment) Work. We have established a risk register as part of our business risk management process, and elements in the supply chain are captured in this register and managed accordingly.

Zaptec: They follow up with plans and measures, and state that they will impose sanctions on their suppliers in case of breaches.

Autel: They have developed a plan to monitor that suppliers operate in accordance with ESG (Environmental, Social, and Governance) standards.

