



Revised statement

Kople AS - Juni 2025

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Description of Kople, organization and areas of operation

Kople's vision: We aim to be a leading charging operator in the Nordic market. Kople's mission: We build and operate infrastructure that enables the green transition.

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We are part of the organized labor market and are affiliated with the Confederation of Norwegian Enterprise (NHO), and we are also a member of the Norwegian EV Association. Kople is owned by Cube Infrastructure and Ringerikskraft.



Area of Operation

The company's area of business is the establishment and operation of charging stations for electric vehicle charging. We provide customized charging solutions for electric vehicles to destinations, commercial buildings, retail locations, and municipalities across Norway.

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

For installation and construction, we work with selected contractors.

Management System

Our work with the Transparency Act is coordinated within our organization and integrated into our Management System. The Management System is structured in accordance with 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. Sjekklister 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 in the company's leadership.

The entire organization has been informed about the management system, and it is recognized as governing for the operation of our business. This includes the work related to the Transparency Act and proactive due diligence assessments of our suppliers. The aim is to uncover any potential or actual risks of human rights violations and breaches of decent working conditions.

ISO Certification Work

We have initiated work on ISO certifications within ISO 9001 (Quality), ISO 14001 (Environment), and ISO 45001 (Occupational Health and Safety), and we have completed the first audit. The second audit is expected to take place before summer 2025. This work contributes positively by ensuring that our processes and routines are followed for optimal quality and continuous improvement of our products and services.

The management system will become interactive during Q3 2025 to provide all employees with optimal access to governing documents, procedures, processes and descriptions, checklists, and forms.

The management system is dynamic and updated as needed or when changes occur.

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Before entering into agreements with suppliers, the procedure "Procurement of Goods and Services" is followed.

Suppliers must confirm whether they have a *Supplier Code of Conduct* as part of their contractual terms with their own suppliers, and they must also adhere to our ethical guidelines and supplier requirements.

Kople's Ethical Guidelines

Ethical business conduct - our relationship with the outside world

- At Kople, we maintain high ethical standards in all our business operations. This requires honesty and fairness in all matters related to business activities.
- These guidelines set the premise for how employees interact with each other and the external environment.
- Kople bases its operations on the ILO (International Labour Organization) core conventions and shows respect for the UN's human rights and labor rights.

Due Diligence Assessment

§5b Information on actual adverse impacts and significant risk of adverse impacts that the company has identified through its due diligence assessments §5c Information on measures the company has implemented or plans to implement to cease actual adverse impacts or reduce significant risks, and the results or expected outcomes of these measures.

Own Operations

We have conducted a thorough due diligence assessment of our own operations and have not identified any actual or potentiel negative impacts related to human rights violations or breaches of decent working conditions.

Findings

- Our employees receive competitive wages, and we practice equal pay regardless of gender.
- We are subject to and comply with the Norwegian Working Environment Act.
 - No risk of human rights violations or inadequate working conditions has been identified.
 - No findings indicating any form of discrimination.
- The working environment is assessed as good.

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- We conduct 4 pulse surveys per year to assess job satisfaction and employee loyalty.
- An ergonomic review of workstations was carried out in 2024.
- The Norwegian Labour Inspection Authority audited us in 2024 without issuing any remarks.

We therefore consider the risk of negative impacts in our own operations to be nonexistent or very low.

Supply Chain and Business Partners

We primarily collaborate with suppliers and contractors in Norway, Scandinavia, and Europe. When entering into agreements with new key suppliers, we require adherence to fundamental human rights and decent working conditions.

Kople's suppliers can broadly be divided into product suppliers and service providers. We work closely with the largest suppliers in our industry.

We always assess alternative suppliers when procuring products and services to ensure we collaborate with companies that monitor their own supply chains regarding fundamental human rights and decent labor conditions.

All our key suppliers have committed to complying with our *Requirements for Suppliers / Supplier Code of Conduct*, which includes requirements for decent working conditions, human rights compliance, ethics, and environmental responsibility. Kople does not enter into partnerships with suppliers who fail to commit to these principles.

New Suppliers

Due diligence assessments of new suppliers are carried out through a four-step process:

- Self-declaration facilitated by the procurement/supplier manager
- A FORMS questionnaire sent to new key suppliers
- Evaluation of the supplier based on their response and additional information
 - If risk or actual violations are discovered, immediate action is taken
 Alternatively, the agreement is not entered into
 - Follow-up is initiated
 - If no findings or risks are identified, an agreement is concluded

Risk factors considered include:

- Country risk ITUC Global Rights Index
- Product risk High-risk procurement list
- Respect and Corporate Social Responsibility concerning fundamental human rights

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Existing Suppliers

Annual supplier follow-up and evaluation

Each supplier manager follows up on their supplier portfolio, gathers necessary information, and updates due diligence assessments to follow up on any necessary actions.

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

We closely monitor our electric vehicle charger suppliers to ensure they follow through on their stated plans and measures to prevent human rights violations and labor issues in their supply chains.

Findings and Measures – Suppliers 2025

Some EV charger suppliers have informed us that there are known actual negative impacts and significant risks in their supply chains related to human rights and decent labor conditions—particularly in raw material extraction, minerals, and materials production. We are following up closely with these suppliers to ensure they implement the measures and plans they have communicated to mitigate such risks.

We expect that our efforts will increase internal awareness of choosing the "right" suppliers, help us identify risks related to the aims of the Transparency Act, and ensure that existing suppliers continue their efforts to safeguard their supply chains.

No findings among our suppliers have required additional follow-up or sanctions.

Kople has reviewed its portfolio of key suppliers, including:

- Autel Netherlands BV: No new risks identified. Ongoing dialogue and meeting structure being followed up.
- **Caverion Norge AS:** No new risks identified. Strong focus on environment and HSE. Weekly follow-up meetings.
- **Driivz Ltd:** New software back-end provider in 2024. Questionnaire completed. Not subject to the Transparency Act and lacks certified environmental management system. Followed up with weekly meetings. No risks identified requiring special follow-up.
- Kempower AS/OY: No risks identified. Strong focus on sustainability. Regular meetings held.
- Laje AS: No new risks identified. Strong focus on environment and HSE. Follow-up meetings as needed.
- Kraftriket AS: Power supplier. No risks identified.
- **Zaptec Charger AS:** Based in Stavanger. No risks identified requiring follow-up. Follow-up meetings as needed.

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• **Com4 AS:** Network service provider. No risks identified requiring follow-up. Follow-up meetings as needed.

Contact Information

For questions regarding this statement or our work with transparency and accountability, please contact:

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