

## Account of due diligence in accordance with the Norwegian Transparency Act

### NorDan Gruppen AS

NorDan Gruppen AS is one of Europe's leading manufacturers of windows, doors and smart accessories. On the operational side, the company has 12 factories in 5 countries, and this account of due diligence is mainly focused on the NorDan Group's manufacturing operations consisting of: NorDan AS (Norway), NorDan AB (Sweden), NorDan Sp.z.o.o (Poland), NorDan Vinduer A/S (Denmark), NorDan UAB (Lithuania), NorDan Trading (China). In addition, we have administrative units and sales offices in the key markets Norway, Sweden, Denmark, the UK and Ireland. In 2024 NorDan Gruppen had 2350 employees and revenues of NOK 5015 million.

The Norwegian Transparency Act (NTA) requires large enterprises to carry out and report on due diligence assessments to identify, prevent, and mitigate adverse impacts on fundamental human rights and decent working conditions. It encourages openness and accountability in how companies operate and interact with people, communities, and their supply chains.

NorDan Gruppen AS published its initial due diligence assessment for the 2022 reporting year in June 2023. The subsequent 2023 assessment was released in June 2024, and this follow-up report encompasses the period from January 1 to December 31, 2024. All reports can be found on the company's website: [nordangruppen.no](https://nordangruppen.no).

At NorDan we care about people, the environment and assets. Safety is our main priority, and we never compromise on the safety of our employees or business partners. Our key values are *sustainable, honest, action oriented, result driven and people focused*. Our vision is "Perfect Samspill" (perfect interaction) which is used internally as well as in our cooperation with suppliers and customers.

### Organization and responsibilities

Accountability, sustainability, employees' working conditions, human rights and ethical standards are documented in the company's policies, guidelines, procedures and Code of Conduct. The ultimate responsibility for the company's Code of Conduct documents and ethical standards lies with the Group Chief Executive Officer (CEO) and the Board of Directors.

NorDan Gruppen AS has a sustainability strategy where targets and priorities for sustainable products and operations are defined. The NTA particularly promotes UN's sustainability goal no. 8: Decent work and economic growth. The Chief Sustainability Officer (CSO) in the NorDan Group is responsible for reporting related to the NTA. The CSO reports directly to the CEO.

The Board of Directors is responsible for oversight and ensuring respect for human rights throughout our business activities.

### Supply chain

At NorDan we recognize that we rely on our suppliers and the supply chains to operate, and that it is of the highest importance to ensure compliance to human rights and good working conditions. NorDan has clear principles and expectations for our business partners to ensure such compliance. We work with well known suppliers, primarily from Europe, and emphasize long-term and sustainable cooperation. NorDan has a high level of transparency throughout the supply chains. All main suppliers are pre-qualified with regards to responsible business conduct which also is embedded in frame agreements. Our extensive work on Environmental Product Declarations (EPDs) and traceability on origin of materials over the last couple of years have increased the transparency level in our supply chains further. The EPDs have given NorDan the necessary means to document the environmental impact of incoming material and share this with customers.

We require our main suppliers to sign our Supplier Code of Conduct where we set our expectations, principles, and minimum requirements to suppliers' conduct. We expect our suppliers to exercise good judgement, care, and consideration by adhering to it. Compliance with human and labour rights and good working conditions at our suppliers is also followed up in the ongoing dialogue with these companies and in renegotiations of frame agreements, as well as through NorDan's supplier audit program.



## Ongoing compliance

To ensure compliance with fundamental human rights and decent working conditions, NorDan has conducted a thorough due diligence process where relevant departments were involved to collaborate on a corporate level. Our due diligence covered description of our organization, area of operation, elaboration of risk assessments as well as assessment of suppliers and supply chains in accordance with the OECD guidelines for multinational enterprises. The scope of evaluation and due diligence has followed NTA Section 4. During 2024, NorDan has conducted a double materiality analysis, in compliance with the Corporate Sustainability Reporting Directive (CSRD), involving key representatives as well as an external consultant.

Procedures have been implemented at NorDan to conduct due diligence assessments on an ongoing basis. Also, the work scope of the procurement department at NorDan has been extended to make sure that, on an ongoing basis, suppliers and the supply chain follow acceptable ethical standards and show compliance with human and labour rights and good working conditions.

If an assessment identifies any actual and/or potential negative consequences for basic human rights and decent working conditions in NorDan's supply chain, it is reported to the Chief Sustainability Officer without undue delay, and appropriate measures are implemented accordingly.

## Status

In general, NorDan's business activities with manufacturing and sales of windows and doors are concentrated to northern Europe, mainly Norway, Sweden, Denmark, the UK, Ireland, Poland and Lithuania. The due diligence process has revealed low risk levels overall and a good level of conformance to NorDan Group's policies, guidelines, routines and Code of Conduct.

Our suppliers are well-known European companies and are located in countries with low risk of deviations and negative consequences for fundamental human rights and decent working conditions. We also know from years of cooperation that these companies, on a general note, have good handling of their sub-suppliers and supply chains. The due diligence has also confirmed that NorDan does not have any suppliers in Russia and Belarus. Our sub-suppliers have also confirmed the same.

Through the ongoing assessment process, the double materiality assessment, and the application of the internationally recognized Fragile State Index, two main areas of higher risk have been identified; 1) Suppliers and raw materials from China and 2) NorDan entities with supply and fit business.

Ad. 1: In 2024, the direct sourcing from China accounts to approximately 5% of NorDan's total purchasing value. The main products sourced are ironmongery for windows and doors. Since 2010, NorDan has had its own trading office in Ningbo, China, under the company name NorDan Trading (Ningbo) Co., Ltd. This office was established to manage the purchasing volume, ensure good business standards, high-quality components and satisfactory respect for human rights and decent working conditions. The company is led by a Norwegian manager. More than 80% of the sourced volume from China comes from one supplier in Ningbo. NorDan Trading has offices adjacent to this supplier's production facility, enabling daily cooperation and production transparency. The remaining sourced volume originates from a second supplier in Ningbo that specialises in export to companies in Europe. NorDan Gruppen conducts an annual supplier audit of NorDan Trading, whereas NorDan Trading conducts supplier audits of the two suppliers.

Ad. 2: Most entities within NorDan Gruppen sell windows and doors to building companies and retail stores (supply-only). Two entities, NorDan Ireland Ltd. (Ireland) and NorDan Rubicon AS (Norway), operate a supply-and-fit business model, whereby they deliver and install products on construction sites or at residential properties using their own employees in combination with subcontractors. To mitigate risks, NorDan ensures that all subcontractors are subject to regular follow-up, and that the majority have already signed NorDan's Supplier Code of Conduct. These subcontractors must comply with all requirements and standards, including safety procedures, employment contracts, salary levels, and overtime. NorDan UK (United Kingdom) also carries out supply-and-fit work, accounting for less than ten percent of its revenues. Oversight of supply-and-fit entities is maintained through the respective boards and management teams in each company.



## Contact information

For questions related to the NTA, sustainability, human rights etc. interested parties are asked to send an e-mail to [firmapost@nordan.no](mailto:firmapost@nordan.no).

Moi, 29 April 2025  
(signed electronically)

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Chair of the Board

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