



Nobia and the Transparency act

Åpenhetsloven 2023

Introduction

Nobia – our response to the transparency act

At Nobia Norway AS we work actively to ensure that we comply with basic human rights, as well as to ensure decent working conditions in our own operations and in the supply chain.

This declaration describes how Nobia Norway is working with the Transparency Act to ensure that human rights and decent working conditions is embedded in our own operations and in the supply chain.

Our greatest asset is our people. Since our foundation, Nobia Norway has conducted its operation on an ethical foundation, encouraging and enabling its employees and suppliers to operate within the same principled structure.

Nobia Norway is committed to preserving human rights and decent working conditions. At Nobia we do not accept human rights abuses such as forced and compulsory labour, slavery, servitude, and human trafficking to be part of today's modern business and supply chains.

Nobia publishes the account of the due diligence assessments in accordance with the Transparency Act, through the sustainability report and on Nobia's website. The report applies to the period 1 January 2023 – 31 December 2023.



Background to åpenhetsloven

The Norwegian Transparency Act is modeled on the OECD Guidelines for Multinational Enterprises. As a leading kitchen company, Nobia carry out due diligence pursuant to the OECD guidelines.

Nobia treats social responsibility issues with the utmost care by assessing and monitoring the business impact on social, labor and human rights in accordance with the OECD guidelines, and by taking accountability for the impact Nobia business operations have on society, directly or indirectly through business partners.

As per the law companies are obligated to implement actions to either make up or reduce adverse impacts on human-rights and decent working conditions. The Norwegian Consumer Authority is responsible for overseeing the Act's implementation.

The law has two primary purposes:

- Transparency by ensure public information on how companies are working to reduce adverse impact on human rights and decent working conditions.
- Act by promote companies' respect for basic human rights and decent working conditions in own operation and supply chains.



Nobia Norway AS Business

Nobia Norway AS is a company within the Nobia Group. Nobia AB, the parent company of the Group, is a Swedish multinational home kitchen manufacturer, headquartered in Stockholm and listed on Nasdaq Stockholm. Nobia Norway AS produces and sells kitchens under the brands Norema, Sigdal, Marbodal and Granarp.

The business has its head office with sales and administration at Trollåsen and production for the Sigdal brand in Eggedal.

In 2023, the Company's turnover was MNOK 765,7. The company sells 100% via dealers and contractors for all brands. The company mainly operates in the Norwegian market and the primary factor that affects the company's turnover and earnings is the development in the Norwegian housing market in the form of new construction.

At the end of the financial year, there were 181 man-years in the company distributed among 191 employees. Of the total number of employees, 129 are women (68%).



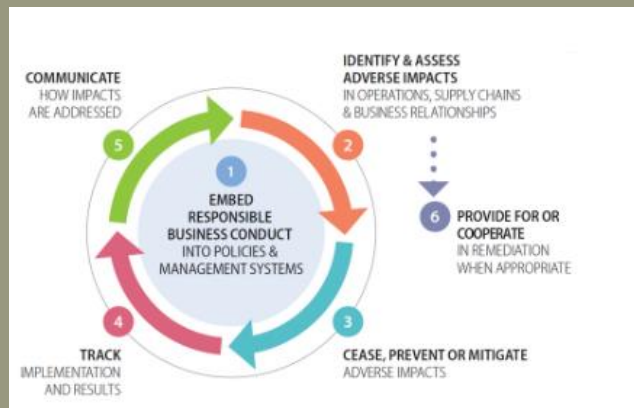
Due diligence in the operation

Due diligence in the supply chain

Due diligence is a continuous process to help enterprises identify risks relating to human rights, labour rights and the environment with a view to ending, preventing or mitigating those risks. Due diligence is an essential element of international responsible business conduct and is a key theme of the internationally endorsed OECD Guidelines for Multinational Enterprises (2011) and the United Nations Guiding Principles (UNGPs). Due diligence is also known as supply chain responsibility.

The purpose of due diligence is first and foremost to avoid causing or contributing to adverse impacts on people, the environment and society, and to seek to prevent adverse impacts directly linked to operations, products or services through business relationships. When involvement in adverse impacts cannot be avoided, due diligence should enable enterprises to mitigate them, prevent their recurrence and, where relevant, remediate them.

The due diligence process consists of six stages which can be seen below.



Supply chain due diligence

Nobia work in a structured way to ensure a responsible and sustainable supply chain. Nobia Norway AS's work with the Transparency Act is rooted in both the board and management. On a regular basis we perform Group wide risk assessments to identify potential negative consequences for basic human rights and decent working conditions, both internally in our business and in our supply chain. Among other things, these risk assessments are normally carried out by key people from procurement as well as representatives from our sustainability and risk management team. Our approach includes a review of the supply chain to identify potential risks and develop relevant measures.

Nobia's objective is always to ensure that the suppliers' employees have proper employment agreements, documented wages, freedom of association, that working time regulations are observed and that the employees' health and safety are taken care of:

- All suppliers must accept our Supplier Code of Conduct. The standard includes requirements for working conditions, human rights, wages, forced labor, freedom of association etc.
- Nobia regularly evaluate our suppliers through background checks, self-evaluations, and system audits
- All stakeholders (external & internal) can always report violations or risks of violations of human rights and decent working conditions through Nobia's SpeakUp channel

If Nobia detects non-conformances or violations of laws, regulations and our standards for suppliers, the suppliers must remedy the situation within a certain time. Nobia will work together with those suppliers in this remedying process.



Policies implemented to ensure respect for decent working conditions and human rights

Guidelines and policies in own operation:

Nobia has implemented several key policies to limit negative consequences on human rights in our own operations.

The Code of Conduct ensures compliance with applicable laws and agreements, establishing ethical guidelines for our employees worldwide. Nobia prioritizes health and safety through our dedicated policy, having a safety-first culture and we aim for continuous improvement.

The Equality and Diversity Policy promotes inclusivity, aiming to eliminate discrimination and harassment in the workplace. This policy underlines Nobias commitment to treating employees with respect and dignity, regardless of their age, sex, ethnicity, nationality, religion, sexual orientation, disability, political beliefs, or social status.

The Group People policy sets out criteria to fully adopt principles related to Human Rights. Lastly, our sustainability policy sets the standard for our focus on financial, environmental and social responsibility simultaneously.



Policies implemented to ensure respect for decent working conditions and human rights

Relevant policies and commitments in our supply chain:

The Nobia Supplier Code of Conduct and the Purchasing Policy cover all purchasing activities. The Supplier Code of Conduct is attached as an amendment in contractual terms. We expect our suppliers to familiarize themselves with the content and sign the agreement accordingly.

Group Management is responsible for the Purchasing Policy, which is reviewed on a regular basis. The strategic sourcing team is continuously working on internal competence for the team employees. Nobia employees are given training in policies and procedures to ensure they are understood and to enable them to advance in their employment.

The sourcing function is a critical part of our organization. We have established routines for following up sustainability risks in our supply chain.



Policies implemented to ensure respect for decent working conditions and human rights

Relevant policies and commitments in our supply chain:

- Nobia have signed up to the UN Global Compact
- Nobia respect the principles of the Universal Declaration of Human Rights and the International Labour Organization's fundamental conventions on labour standards
- Nobia support the UN Sustainable Development Goals

You can read more about the work with supplier management and ethics in the supply chain in our annual and sustainability report.

Our ethical guidelines are published on our website;

<https://www.nobia.com/sustainability>

<https://www.nobia.com/sustainability/reporting/>

<https://www.nobia.com/sustainability/responsible-sourcing/>

<https://www.nobia.com/sustainability/sustainability-governance/>

In case you would require more information on how Nobia ensures basic human rights and decent working conditions, send an e-mail to info@nobia.com.





nobia

Designing Kitchens for Life