ECG

Annual Due Diligence Statement Compliance with the Norwegian Transparency Act 2024

1. Introduction

In accordance with the Norwegian Transparency Act, ECG has conducted a due diligence assessment of our supplier base for the reporting year 2024. This report provides an evaluation of supply chain risks related to human rights and ethical business practices in 2024, based on our supplier registry and previous engagements.

Moving forward, ECG will conduct this assessment annually, ensuring that future reports provide a full review of risks and mitigation measures from the previous year.

2. General Description of the Company

ECG | Elite Construction Group is a Norwegian company specializing in industrial services, steel and aluminum constructions, and ISO services. The company has evolved from its origins in maritime industries and now focuses on sustainable development and innovative solutions. ECG's history dates back to 1945, and through strategic mergers and expansions, it has established itself as a key player in the industry. The company operates from modern facilities at Årsnes Industrial Area, providing high-quality solutions for both onshore and offshore projects.

Operations and Markets: ECG primarily operates in Norway and Europe within the industrial, offshore, and aquaculture sectors, focusing on sustainability, innovation, and customer satisfaction. The company sources materials and services mainly from the EU market.

Our range of services includes:

- Steel and Aluminum Constructions: Tailored structural solutions for various industries.
- ISO Services: Expertise in scaffolding, insulation, and surface treatment.
- Maintenance and Modifications: Supporting maritime and industrial sectors with vessel maintenance and upgrades.
- Personnel Rental: Providing skilled professionals for external projects.
- Storage, Logistics, and Accommodation: Offering infrastructure and support services for industrial operations.

Policies and Procedures for Ethical Business Conduct: ECG is committed to responsible business practices, ensuring compliance with international labor and environmental standards. The company has implemented a structured quality management system and adheres to ISO certifications, including ISO 9001, ISO 14001, and EN 1090-1. ECG prioritizes safety, transparency, and continuous improvement in all aspects of its operations.

We have established a Supplier Code of Conduct, requiring all suppliers to adhere to internationally recognized labor standards, including compliance with the Norwegian Transparency Act and EU directives.

Organizational Structure: ECG is structured as a hierarchical organization. The command line goes from the top (the general assembly) to the bottom (the workers), and has intermediate levels such as the board, CEO, and department heads. ECG is private owned and part of group structure.

3. Due Diligence Assessments

Process for Conducting Due Diligence Assessments: ECG conducts an annual risk assessment of its supplier base, evaluating key risk factors such as geographic location, industry, and supply chain complexity. This assessment is based on internal supplier evaluations and external compliance frameworks.

Identified Risk Areas: No high-risk suppliers have been identified. All suppliers operate within the EU, where labor and human rights standards are strictly regulated. ECG continuously monitors potential risk factors in industries that historically have challenges related to labor conditions and ethical business practices.

4. Findings

Our due diligence assessment did not identify any significant human rights risks or unethical labor practices within our supplier network. All suppliers operate within the European Union, where labor and ethical standards are strictly regulated. ECG continuously monitors compliance within our supply chain to ensure adherence to these standards.

No corrective actions were deemed necessary at this time. However, we acknowledge that risks can still exist within certain industries and geographies, and we will continue to monitor and reassess our supply chain on an annual basis.

5. Measures Taken

Actions Taken or planned to address identified risks: ECG expects all key suppliers to comply with our ethical business policies and conducts ongoing supplier evaluations to monitor adherence.

Results or expected outcomes of these measures: Through regular monitoring and supplier dialogue, ECG aims to ensure continued compliance and ethical sourcing practices within our supply chain.

6. Reporting Mechanism

ECG is committed to ensuring transparency and ethical business practices throughout our supply chain. We encourage all stakeholders, including suppliers, employees, and business partners, to report any concerns related to human rights violations, unethical business practices, or supply chain risks.

Suppliers are expected to comply with ECG's Supplier Expectations document, which outlines our requirements for responsible business conduct. This document is available on our website and must be acknowledged by all suppliers.

Suppliers and stakeholders can report any findings or concerns to ECG at:

- **Email:** post@ecgas.no

All reports will be handled confidentially, and ECG is committed to taking appropriate action where necessary. ECG expects all suppliers and business partners to uphold the highest ethical standards and comply with internationally recognized labor rights and human rights principles.

7. Conclusion from Management

Based on our assessment, ECG has not identified any significant risks of human rights violations or unethical labor practices within our direct supplier network. However, we will continue to monitor developments in our supply chain and reassess risk levels annually.

As a proactive measure, ECG will:

- Maintain an open dialogue with suppliers regarding ethical business practices.
- Require key suppliers to formally acknowledge and adhere to our Supplier Code of Conduct.
- Ensure that all current and future key suppliers undergo regular risk evaluations.

ECG remains committed to ethical sourcing and transparency, continuously improving our approach in line with the requirements of the Norwegian Transparency Act.

8. Signatures

This report is signed in accordance with the Norwegian Transparency Act, ensuring compliance with due diligence obligations and reporting requirements.

Name: Robin Pedersen
Title: CEO
Date: 24.09.2025

Name: Karl Anders Horneland
Title: Chair of the Board
Date: 24.09.2025