

## **Annual Due Diligence Statement Compliance with the Norwegian Transparency Act 2025**

### **1. Introduction**

In accordance with the Norwegian Transparency Act, ECG has conducted a due diligence assessment of our supplier base for the reporting year 2025. This report provides an evaluation of supply chain risks related to human rights and ethical business practices in 2025, based on our supplier registry, accounts payable data, 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. Total supplier spend in 2025 amounted to NOK 89 million across 252 suppliers, with materials and services sourced mainly from the Norwegian and 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.
- **Aquaculture Technology:** Design and production of closed marine-grade aluminum pens.
- **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. Compliance responsibility is anchored at board level; operational responsibility rests with the CEO, supported by the Head of HR and the Head of Finance.

### 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. For 2025, the assessment was grounded in a formal Supplier Evaluation Register covering key suppliers with documented criticality scoring, and the company's full accounts payable data recording purchases from 252 suppliers totalling NOK 89 million. This assessment is based on internal supplier evaluations and external compliance frameworks.

**Identified Risk Areas:** No high-risk suppliers have been identified. All key suppliers operate within Norway and the EU/EEA, where labour and human rights standards are strictly regulated. ECG continuously monitors potential risk factors in industries that historically have challenges related to labour conditions and ethical business practices. The following risk categories have been assessed:

- Own operations: Norwegian operations are subject to Norwegian labour law, collective agreements, and oversight by the Norwegian Labour Inspection Authority (Arbeidstilsynet). ECG maintains ongoing HSE programmes and conducts regular internal audits.
- Subcontractors and personnel suppliers: The use of subcontractors and staffing entities — including those registered outside Norway — carries inherent risk related to labour conditions and working environment. ECG monitors this segment through contractual requirements and ongoing supplier dialogue.
- Tier-1 material and service suppliers: Suppliers primarily based in Norway and the EU/EEA, where labour and human rights standards are strictly regulated. ECG sources materials and services from established actors in the European market.

### 4. Findings

Our due diligence assessment did not identify any significant human rights risks or unethical labour practices within our supplier network. All key suppliers operate within Norway and the European Union, where labour 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. In particular, ECG recognises that the use of subcontractors and personnel suppliers warrants ongoing attention, and has initiated structured measures to strengthen compliance in this segment going forward.

## **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. The following measures have been implemented:

- Formal Supplier Evaluation Register maintained with criticality scoring and compliance tracking for all key suppliers.
- Evaluation forms distributed to key suppliers; responses documented and followed up.
- Supplier Code of Conduct revised and communicated to all key suppliers; formal acknowledgement required for new contracts and renewals.
- Human rights and labour standard requirements incorporated into standard contract templates.
- Pre-qualification screening for new subcontractors and personnel suppliers introduced.
- Whistleblowing channel maintained at [post@ecgas.no](mailto:post@ecgas.no) with confidential handling procedures.

Planned measures for 2026 include strengthening the compliance process for subcontractors and personnel suppliers, extending the formal evaluation process to a broader set of suppliers, and developing a documented risk register to enable year-on-year tracking of identified risks and mitigating actions.

**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](mailto: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:

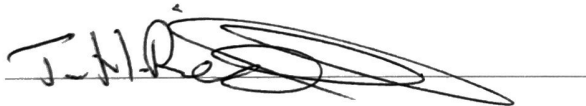
- Maintain an open dialogue with suppliers regarding ethical business practices.
- Require key suppliers to formally acknowledge and adhere to our Supplier Code of Conduct.
- Ensure that all current and future key suppliers undergo regular risk evaluations.

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.

Approved by the board on 25<sup>th</sup> June 2026

A handwritten signature in black ink, appearing to read 'T. H. Rimestad', is written over a horizontal line.

Name: Tom Henning Rimestad

Title: CEO

Date: 26<sup>th</sup> of June 2026