

Norwegian Transparency Act Statement
2024

Aars



About Aars

Organisation and business

Aars is a family company owned by the Møller family, with active ownership in Norway, Sweden, Denmark, Finland and the Baltic region. Aars is both a family business and an investment company. We look after our owners' financial investments, but as a family-owned company we are interested in more than just financial returns: we also wish to create good workplaces and give something back to society by helping to solve some of today's major challenges.

Aars now has more than 8,000 employees. In 2024, the Group had total revenues of NOK 47.5 billion from its companies in seven countries.

The business is led by Chair of the Board and CEO Øyvind Schage Førde, and has three divisions:

1. **Asset Management** – which invests primarily in listed shares and various types of funds
2. **Direct Investments** – which invests directly in companies as an active owner
3. **Finance and Operations** – which has responsibility for the financial management and control of the company, and also operates the family business and Aars premises

This statement covers our work in connection with the Norwegian Transparency Act across our three divisions during the 2024 business year. It considers up-to-date risk analyses, the effect of the previous year's initiatives, and new measures that Aars has undertaken to implement during the 2025 business year.

For further information about the business and its subsidiaries, please refer to Aars's 2024 annual report.

Responsibility at Aars

Foundation in strategy and management systems

Aars regards being a responsible owner as its most important societal role, and we see contributing to the development of a more sustainable business sector as being part of our social remit. We invest and engage in companies that we believe will benefit from our active ownership, and we contribute to shaping the future by owning and operating profitable companies that are good places to work.

Aars has an overarching objective for its ownership: to be a responsible owner. We focus our efforts in this through a number of clear priorities in each of the areas of Environmental (E), Social (S) and Governance (G).

Being a responsible owner	
Environmental	We will reduce our carbon emissions and energy consumption
Social	We will be an attractive workplace that offers inclusive environments, and we will actively contribute to increased workplace inclusion
Governance	We will run our businesses in a responsible, open and sustainable manner

Being a responsible owner is our most important societal role, and is also the core of ESG work at Aars. This focus area permeates everything we do and everything we want to be known for. Ethics and responsibility have always been guiding principles for our owners' ventures. The legacy of our founder Harald Aars Møller and his maxim "you must keep your path pure" means that we have clear expectations regarding attitudes and behaviour, and our current owners are keen to preserve this approach. We maintain high standards of business ethics, corporate governance and compliance with legislation. Our approach to running the business remains founded on preserving trust and credibility, and caring for our employees and surroundings. This is also reflected in all our governing documents and internal guidelines, and is anchored in our Board and management.

When working on sustainability, and especially in connection with our work on responsibility, the business relies on a number of international conventions and standards, in particular:

- UN Sustainable Development Goals
- UN Global Compact
- OECD Guidelines for Multinational Enterprises
- UN Guiding Principles on Business and Human Rights

In all the companies in which we are engaged, we expect fundamental human rights and the right to decent working conditions to be respected, which is reflected in our strategy as a responsible and active business owner.

Responsibility at Aars

Due diligence assessment

Aars's due diligence assessment is based on the OECD Guidelines on responsible business conduct. As an investor in and owner of a number of companies, we expect these to perform their own due diligence assessments.

For the purpose of Aars’s internal assessment of the risk of breach of human rights and the right to decent working conditions, we have chosen to categorise our activities into three categories across our divisional structure.

Long-Term Investments	Short-Term Investments	Purchasing
Includes direct ownership and investments with a significant direct influence as an owner	Primarily includes Aars’s investments in shares and funds via brokers and asset managers	Includes purchases of all goods and services for the company, including those relating to the operation of the premises at Bygdøy Allé 4

Figure 1

For the companies in which we have invested that are subject to the Norwegian Transparency Act, it is the responsibility of each company to prepare their own due diligence assessments and statements in accordance with the Act. Aars performs its own independent assessments from an ownership perspective with regard to the risk of breach of human rights and the right to decent working conditions in its own operations. To ensure clarity with respect to this assessment and the various companies’ own due diligence assessments, no details relating to individual companies are included in this statement. Such information is readily available on those companies’ respective websites.

For the due diligence assessment relating to our internal operations, we have chosen to describe the risk assessments at category level.

The due diligence assessment was performed using input from all three divisions. In the following sections, we report the risk assessment performed for the 2024 business year and the effect of previously identified measures, and we describe new measures that the business will prioritise going forward to ensure continued focus and accountability on this topic.

The due diligence assessment is followed up on an ongoing basis and is updated in accordance with any changes, and as a minimum a new version will be prepared each year.

Due diligence assessment

Long-term investments

The following companies were included in Aars’s long-term investments in 2024.

- Møller Mobility Group
- Møller Eiendom
- Møller Medvind
- Medvind Utvikling
- OneCo
- Onitio
- Function (formerly Micro Matic)
- Alfa Sko
- Iterate

As an active owner, we make clear our expectations that Aars’s values regarding responsibility are to be upheld in all our companies. In addition to formally

following up the companies’ management through the Board of Directors, we maintain continuous dialogue regarding our expectations, and we also endeavour to contribute expertise and exchange of experience across all our companies.

The Norwegian Transparency Act, human rights and decent working conditions are key topics in Aars’s work with all its companies. We are committed to keeping our companies aware of their related obligations and statutory reporting, and we support the companies by ensuring they have access to the necessary information, expertise, governing documents and templates. We expect the companies to complete their reporting of their due diligence assessments in accordance with the Norwegian Transparency Act well before the deadline of 30 June of each year, and are confident that this reflects the continual work carried out in this area. Most of the companies in our long-term portfolio are subject to the Norwegian Transparency Act, and therefore as owner we provide support to the individual companies in their due diligence assessments and reporting.

The figure below provides an overview of how Aars as an active owner can influence the companies in this area, and of which companies are individually covered by the Act and which are not.

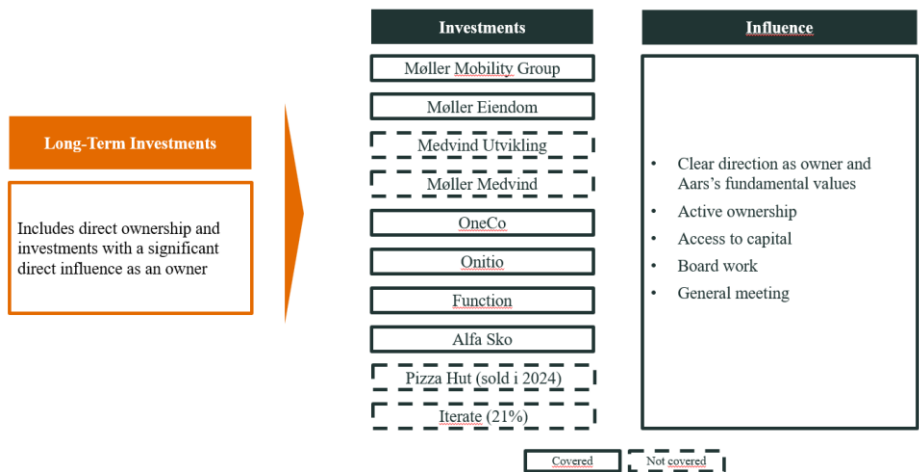


Figure 2

Irrespective of whether they are covered by the Norwegian Transparency Act, we set the same requirements and have the same expectations of all our companies.

If Aars perceives that our values and expectations are not being met within the companies, we will implement measures to make the necessary changes, and in the most extreme of cases the result may be a change in a company’s management.

It is each company’s responsibility to perform a due diligence assessment of its own activities. From Aars’s perspective, we have also chosen to undertake an overarching assessment of risk for our long-term investments, as a provisional assessment of whether we need to implement measures relating to the activities and follow-up described above. The Board of each company has a mandate to continually follow up and assess whether necessary due diligence is being addressed in the companies, and whether further measures and follow-up are required.

The overall assessment of our activities in long-term investments is that they are associated with low risk in this area, based on our active ownership and close dialogue to ensure that the individual companies comply with the Norwegian Transparency Act.

Due diligence assessment

Short-term investments

Our short-term investments primarily include the company’s investments in shares and funds via brokers and asset managers.

When it comes to investments in listed shares and funds, Aars’s influence on the individual companies in the portfolio is limited. Our investment mandate in this area is subject to the same expectations on responsibility and sustainability anchored in our history and our owners’ values, and is further highlighted in the company’s sustainability strategy.

We primarily follow up our biggest investments in individual shares through management meetings and by voting at general meetings. For small investments and investments in funds, we expect our brokers and asset managers to take care of our interests in relation to responsibility, and we regularly follow this up in meetings with them. In the most extreme of cases, we will choose to refrain from investing or divest our existing positions, if our expectations regarding responsibility cannot be satisfactorily documented. The figure below summarises the various categories of investments and how we ensure that our expectations regarding sustainability and responsibility are met in practice.

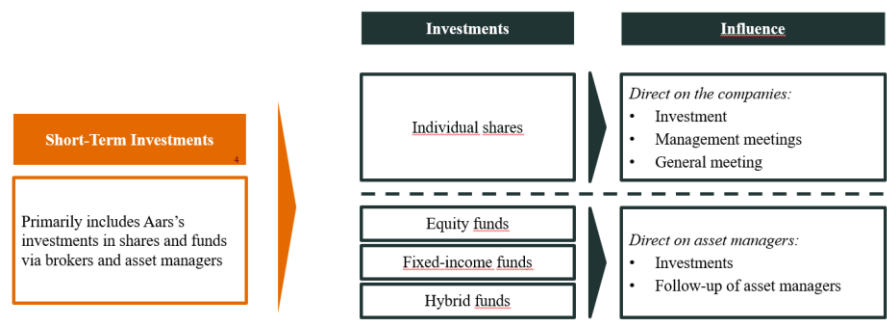


Figure 3

The overall assessment of our activities relating to the company’s short-term investments is that they are associated with low risk. Our investments in individual shares are subject to rigorous assessments and due diligence in relation to responsibility, and we only use recognised local brokers and asset managers whom we actively follow up through close dialogue as described above. No matters have come to light that have required Aars to implement special measures relating to its investment activities in shares and funds.

Due diligence assessment

Purchasing

Aars's activities in this area include all purchases of goods and services for the business, including for the operation of our premises at Bygdøy Allé 4.

Our influence in the area of purchasing is primarily addressed by being a responsible customer that sets clear requirements and expectations for our suppliers, such as through our Code of Conduct. Aars has always prioritised using local suppliers, maintaining close dialogue and being a long-term customer that expresses itself clearly and contributes towards predictability for our suppliers.

As a basis for our due diligence assessment in this area, we have chosen to categorise our suppliers into the following categories:

- Professional services
- Financial services
- Information services
- Software
- Insurance
- Food/catering
- Cafeteria personnel
- Cleaning services
- Premises
- Vehicles
- Administration and operations
- Art

Our overall assessment is that none of the categories/suppliers are associated with significant risk. This assessment is based on Aars making its expectations clear, maintaining close dialogue and having a long-term view in collaboration with our suppliers. In general, our suppliers have short, transparent value chains. As regards the transport of goods, we have implemented measures to ensure that we only use large, recognised suppliers to reduce the risk of adverse working conditions and working hours, which we know is a risk in this industry. Within cleaning, Aars uses a local supplier with whom we have worked with for many years; this supplier has a dedicated person who deals with assignments at Aars and who is also closely monitored by the officer responsible for the agreement at Aars. Purchasing is a department that is highly aware of this topic and keeps it high on the agenda, as this is an area where they perceive they can make a considerable contribution. The focus is on sustainable local trade, including reducing waste.

As regards the category "Art", Aars has a dedicated curator close to the market who purchases/invests in art primarily through exhibitions and galleries. In all cases, we know who the artist is, and we apply the same fundamental ethical guidelines and expectations regarding decent working conditions for these investments as for Aars's other investments.

The table below summarises our assessments of risk per category, based on our existing suppliers.

No material breaches of the requirements of the Norwegian Transparency Act by any of our suppliers have come to light in the last year, or indeed ever.

Category	Risk assessment	Comments
Professional services	Low	Use only major, <u>recognised</u> suppliers. Support us with their own due diligence assessments
Financial services	Low	Use only major, <u>recognised</u> suppliers. Support us with their own due diligence assessments
Information services	Low	Use only major, <u>recognised</u> suppliers subject to Norwegian law. Support us with their own due diligence assessments
Software	Low	Use only major, <u>recognised</u> suppliers subject to Norwegian law. Support us with their own due diligence assessments
Insurance	Low	Use only major, <u>recognised</u> suppliers. Support us with their own due diligence assessments
Food/catering	Low	Focus on locally produced food from local suppliers. Risk relating to transport mitigated by requirement to use <u>recognised</u> carriers
<u>Cafeteria personnel</u>	Low	Use only major, <u>recognised</u> suppliers subject to Norwegian law. Support us with their own due diligence assessments
<u>Cleaning services</u>	Low	Emphasis placed on good and decent working conditions within the company when <u>entering into</u> contract. Close follow-up with same employee(s) over time
<u>Premises</u>	Low	Maintenance and follow-up performed by <u>Møller Eiendom</u>
<u>Vehicles/fuel</u>	Low	Møller Bil provides vehicles. Carry out own assessment. Fuel purchased at pump using fuel card
Art	Low	Have own curator who primarily purchases art through ordinary exhibitions. The artists' choice of art form is not assessed
Administration and <u>operations</u>	Low	Purchases made via established companies subject to Norwegian law. Aars conveys its expectations via Code of Conduct and follows up the companies' due diligence assessments

Figure 4

Due diligence assessment

Follow-up and measures

Although Aars's due diligence assessment did not identify any actual harm or specific areas constituting significant risk, the annual process of preparing a due diligence assessment helps to raise awareness of and increase focus on the topic, while underlining the importance of actively working on responsibility both internally and with the companies in which we have invested. As a result of last year's due diligence assessment, a number of measures were identified that would further reinforce our work in this area. These include increasing awareness and providing training within Aars's business around the topics relating to the Norwegian Transparency Act. We are continuing to focus on our endeavours to safeguard human rights and decent working conditions.

Effect of measures for 2024

A number of the identified measures for the previous year are measures and initiatives with which Aars is continuing to work. These include training and raising awareness around human rights and decent working conditions, and continuing to develop the Aars Code of Conduct. By increasing our focus in this area, we have gained increased insight into the topic at Aars and our companies, while also increasing control and structure around this work.

In addition to our regular work on the topic, in 2024 we carried out a double materiality assessment consolidated across all our companies. As a result of this process, the work on human rights and decent working conditions in the value chain was identified as one of a number of material topics for the Group. As a result of our work on stakeholder dialogue and the materiality assessments, awareness has been further increased within Aars and its companies of our impact within this area. This insight will help to lay the foundations for further work on this topic at Aars and within the individual companies in the Aars family going forward.

For purchasing relating to operations at Aars, assessments are made on an ongoing basis of whether we can do more in the future to have a positive effect on all our suppliers. This both increases our insight within Aars and helps to strengthen our collaboration with our suppliers, inspiring both internally and externally.

As Aars has defined "Responsible owner" as a defining concept for our entire ownership, we carried out a reputation survey among Aars employees and the companies' executives and middle management. The objective was to survey Aars's actual perceived influence on its employees and companies, and we also wanted to identify areas for improvement that could further strengthen collaboration and our contribution as owner. The survey gave us excellent insight into Aars's reputation as an owner, and we will be using the results in our ongoing work with the people involved in day-to-day operations.

In 2024, several power meetings were arranged with attendees from all the companies, focusing on sustainability, security, workplace inclusion and so on.

The objective of these meetings was to contribute to coordination between the companies by sharing experiences and identifying good solutions and any barriers relating to such topics as human rights and decent working conditions, safety, security and the integration of sustainability into day-to-day operations.

Continuing measures, as well as new measures and expectations for 2025

At Aars, we will continue our efforts to increase insight and awareness relating to our influence on human rights and decent working conditions, and to encourage both our employees and others to make use of our dedicated whistleblowing channel if they discover any undesired incidents, whether internal or external. We expect that our continued efforts will result in even better control and increased structure to this work going forward.

We also expect all our companies to have whistleblowing channels and procedures to facilitate the follow-up of any misconduct or issues of concern in a satisfactory manner for all parties. In addition, through its Board work Aars will continue to monitor the individual companies' own action plans. We are also committed to putting the Norwegian Transparency Act on the agenda at Board meetings throughout the year, with a view to training around ESG as a topic in purchasing processes for the companies and to embed Aars's ESG KPIs. We believe this will result in both Aars and its companies identifying opportunities and risks relating to sustainability at an early phase, and that we will ensure good follow-up and progress in relation to our shared goals.

The Norwegian Transparency Act

Contact

Aars wishes to be an active and visible contributor to society. We therefore welcome any feedback or comments on this statement.

If you have any questions about how Aars works in compliance with the Norwegian Transparency Act, both internally and as a responsible owner, please email your written enquiry, with the subject line "Transparency at Aars", to:

info@aars.no

Oslo, 11 June 2025
The Board of Directors of Aars AS

Øyvind Schage Førde
Chair of the Board and CEO

Morten Møller
Board member

Anne Catrine Møller
Board member

Harald Møller
Board member

John Giverholt
Board member

Tine Wollebekk
Board member

Alexander Woxen
Board member

Mie Caroline Holstad
Board member

(This translation from Norwegian has been prepared for information purposes only)