

O.N. Sunde Group's Work on the Transparency Act

Summary of O.N. Sunde Group's Work on the Transparency Act (2023/2024)

1. Introduction

This document describes the O.N. Sunde Group's efforts to uphold human rights and decent working conditions in accordance with the Transparency Act. The group, which encompasses various business areas, has systematized its work to meet the Act's requirements and support its subsidiaries in their compliance.

Subsidiaries Color Group AS and Voice Norge AS have an independent obligation to prepare reports under the Transparency Act. Read more about their sustainability work and the Transparency Act here:

<LINK> <https://www.colorline.no/om-oss/om-color-line/samfunnsengasjement>

<https://www.voice.no/om-oss/samfunnsansvar/>

2. Changes for 2023/2024

Several clarifications have been made regarding the scope of the Transparency Act since the previous report. O.N. Sunde, which does not supply goods or services, is not required to prepare a report but is now focusing on supporting its subsidiaries to ensure they meet the Act's requirements.

The O.N. Sunde Group has begun work on implementing sustainability reporting in accordance with CSRD, with plans to report under the new rules from the calendar year 2025 (the Color Group is required to report for the calendar year 2024). In connection with this work, efforts are being made to coordinate and align the subsidiaries' sustainability efforts, which also include the scope of the Transparency Act.

3. Particulars of Sunpor's Work

The subsidiary Sunpor Kunststoff in Austria is not directly covered by the Transparency Act. We therefore include a summary of the company's work in this area.

About Sunpor

Sunpor was founded in 1986 and is a world-leading producer of EPS granules used in insulation products. The company is based in Austria and is 100% owned by the O.N. Sunde Group. The products are mainly sold in Europe, but the market is global.

Work on the Transparency Act

Sunpor is committed to protecting human rights and ensuring decent working conditions both internally and in the supply chain. The work is coordinated by the sustainability manager in collaboration with the HR manager and the head of Supply Chain.

Governance Documents and Whistleblowing Channel

Sunpor has developed several governance documents, including a Code of Conduct and guidelines for corporate social responsibility, which are available on the company's website (<https://www.sunpor.at/en/about-sunpor/responsibility>). A whistleblowing channel has been established to report breaches of ethical guidelines.

Due Diligence Assessments

In 2024, Sunpor implemented an AI system for real-time monitoring of suppliers' risk profiles. The focus has been on screening suppliers of styrene, which constitutes 90% of raw material supplies. 90% of raw material suppliers operate in low-risk countries and have committed to ethical standards through their own guidelines. Potential risks have been identified in the procurement of work clothing and the supply chain within the petroleum industry. No actual risks have been identified to date.

Actions and Plans

- Implementation of annual training in the Code of Conduct and ethical business practices for all employees.
- Expansion of risk assessment to cover 95% of raw material supplies in 2024/25, with a special focus on high-risk countries and sectors.
- Further follow-up on AI-based analyses to ensure traceability and enforcement of policies.

4. Contact Information

Questions about our work on the Transparency Act can be directed to: apenhetsloven@onsunde.no

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