

Our statement under the Transparency Act

Reporting period 01.01.2025 – 31.12.2025

Background

Liebherr-Norge AS operates as a wholly owned subsidiary of Liebherr International AG, which is based in Switzerland. **Liebherr-Norge AS** is headquartered in Stange, with subsidiaries in Klepp and Ranheim. We are a supplier of construction and industrial machinery, and most of our customers are contractors.

The Liebherr Group has become synonymous with technological innovation, quality, commitment to engineering excellence and progress dedicated to its customers and business associates all over the world. The Company is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within our company or its suppliers domiciled in Norway.

The Liebherr family's core values, which also include some of the principles that comprise the Transparency Act, can be found here: <https://www.liebherr.com/en-int/group/about-liebherr/core-values/core-values-3935262>

Here is also the link to our code of conduct: [li_compliance_coc_a4_en.pdf \(liebherr.com\)](#)

Liebherr-Norge AS recognises its responsibility to promote and comply with fundamental human rights and decent working conditions in connection with the supply of goods and services;

The Transparency Act: <https://lovdata.no/dokument/LTI/lov/2021-06-18-99>.

Based on the company's due diligence assessments, our operations are generally considered to involve a limited risk of negative impacts on fundamental human rights and decent working conditions. At the same time, the company acknowledges that potential risks may exist within parts of the supply chain and therefore works continuously with due diligence assessments and supplier follow-up.

Being an equal workplace, free from discrimination, bullying and harassment, with a diverse composition of competent, committed and satisfied employees, is something we strive for at all times.

Section 5a of the Transparency Act:

A general description of the enterprise's organisation, area of operation, policies and procedures for dealing with actual and potential negative consequences for fundamental human rights and decent working conditions, discriminatory behaviour, sustainability and the environment.

Supply Chain

Liebherr-Norge AS maintains relationships with many organisations in its supply chain, as well as being a direct employer. In general, within the Liebherr Group of companies the focus of manufacture is predominantly European with raw material supply contracts from multinational partners.



Liebherr-Norge AS is in the process of surveying all our suppliers and business contacts pursuant to Section 5a of the Transparency Act. We use software provided by House of Control for the mapping. When it comes to risk assessment and archiving of collected data, we have stored this in a separate overview of everyone who has received or will be sent the survey.

The survey is divided into six sections, with questions focusing on the following topics

- company information
- whether the company is subject to and has reported in accordance with the Transparency Act.
- the company's and subcontractors' focus on human rights, working environment and working conditions
- freedom to organisational rights
- prevention of discrimination and corruption
- reducing harmful impacts related to climate, environment and other external factors.

Liebherr-Norge AS is bound by a collective agreement through the Federation of Norwegian Industries, which is the largest national association in the Confederation of Norwegian Enterprise (NHO). Our principles of good business practice are based on our Supplier Code of Conduct, which is requested to be signed by all our suppliers.

https://www.liebherr.com/shared/media/corporate/documents/brochures/liebherr-worldwide/germany/lps/liebherr_verhaltenskodex_en_20210721.pdf

Classification of suppliers

We work closely with the follow-up and classification of our suppliers. As of 31.12.2025, we have identified 1049 unique suppliers. These suppliers are sorted according to turnover, business importance and risk exposure, and are to be found in the following industries:

- Transport
- Civil engineering
- Production and sales of parts and equipment
- Repairers of machinery and equipment
- Rental and leasing of machines
- Hiring out of labour
- Sales, service and consulting services

In the survey, we request information regarding the supplier's business operations, including whether the supplier is subject to and has reported in accordance with the Transparency Act. This is used to maintain and update the company's supplier overview and forms part of the company's due diligence assessments. Missing or incomplete responses are included in the company's overall risk assessment of the supply chain. Each supplier response is subject to review and, where necessary, further follow-up regarding missing routines or documentation.

We keep track of which suppliers has received, responded to and returned our Code of Conduct in a partner overview that will be updated annually to include new suppliers.

Finally, confirmation of compliance with our Supplier Code of Conduct, which specifies what we expect from our suppliers, is obtained. This informs our suppliers about our expectations regarding their focus on social responsibility, safety hazards, fair competition, and responsibility for the external environment.

By signing our Code of Conduct, the supplier undertakes to make available to us documentation of due diligence assessments made in the supply chain, and to be available for physical inspection with 14 days' notice should there be reason to do so.

Section 5b of the Transparency Act:

Information on actual negative consequences and significant risk of negative consequences that the enterprise has uncovered through its due diligence assessments.

Due diligence and risk assessment

With regards to potential adverse impacts, we intend to use our investigation to identify risks associated with partners' practices and subcontractors. To minimise any risk, we will closely follow up suppliers and require documentation of a joint commitment to respect for fundamental human rights and decent working conditions.

Where we are uncertain about the impact suppliers and partners have on the outside world, we will require reporting and documentation. If the documentation received does not satisfy our requirements, it may have consequences for the contractual relationship with Liebherr-Norge AS.

Under normal circumstances, we will try to influence the supplier to minimise risk.

In connection with the company's due diligence assessments, certain suppliers have not responded to requests for information and questionnaires related to the Transparency Act. Lack of response is considered a risk indicator and forms part of the company's overall risk assessment of the supply chain.

In such cases, Liebherr-Norge AS carries out a risk-based assessment based on factors such as geographical exposure, industry sector, type of goods or services supplied and previous experience with the supplier. Where relevant, follow-up measures may include additional dialogue, requests for documentation or closer monitoring.

Liebherr-Norge AS wants all people who work for us, our suppliers and partners, to have a good salary to live off, and thus contribute to a good life.

Implementation of measures

The board will be notified if suppliers lack good routines for safeguarding their employees or the external environment by, for example, reporting on

- Violation of applicable national and international laws and regulations regarding the working environment and human rights
- Failure to ensure diversity and equal treatment
- Child labor and other forms of human trafficking
- Discrimination
- Violations of workers rights
- Violation of international conventions on corruption
- Violation of the provisions on climate and the environment
- Violation of the provisions on social conditions

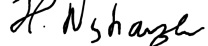
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The board's response to such findings may include requirements for corrective measures, self-declarations, additional documentation, implementation of improvement measures, closer follow-up or, in cases of unwillingness or inability to provide satisfactory documentation, assessment of exclusion from the supplier relationship.

Signed for and on behalf of The Board of Directors

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Richard Klemens Maria Stroebele
Managing Director, finance
Liebherr-Norge AS

Signed by:

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Håkan Nyhaugen
Managing Director, sales
Liebherr-Norge AS