

Our statement under the Transparency Act

Reporting period 01.07.2023 – 30.06.2024

Background

Liebherr-Norway AS operates as a wholly owned subsidiary of Liebherr International AG, which is based in Switzerland. **Liebherr-Norway 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:

[li_compliance_coc_a4_en.pdf \(liebherr.com\)](#)

Liebherr-Norway 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 our due diligence assessments, our operations generally involve a limited risk of negative impacts on fundamental human rights and decent working conditions. Being an equal workplace, free from discrimination, bullying and harassment, having 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-Norway 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-Norway 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

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- company info
- whether the company is covered by and has possibly accounted for the findings of the Transparency Act
- the company's and subcontractors' focus on human rights, working environment and working conditions
- right to organizational freedom
- fighting discrimination and corruption
- focus on reducing harmful impacts on input factors and external factors such as climate and the environment.

Liebherr-Norway 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_veraltenkodex_en_20210721.pdf

Classification of suppliers

We work closely with the follow-up and classification of our suppliers. As of 01.01.2024, we have identified 1542 unique suppliers. These suppliers are sorted according to turnover and importance, 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 ask for an account of the business, as well as whether the partner is covered by the Transparency Act or not. This is to be able to update our own partner overview. This overview will also be updated in accordance with missing/incomplete answers. Each partner's response is subject to our approval, or subject to further work to put in place missing routines.

We keep track of who 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, healthy 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

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-Norway AS.

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

Liebherr-Norway 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**
- **Demands for diversity and equal treatment**
- **Child labor and other forms of human trafficking**
- **Discrimination**
- **Workers rights**
- **Violation of international conventions on corruption**
- **Violation of the provisions on climate and the environment**
- **Violation of the provisions on social conditions**

The board's reaction to these violations may result in a requirement for measures in the form of self-declarations and documentation of implemented improvements, or the risk of exclusion in the event of unwillingness/inability to produce this.

Signed for and on behalf of The Board of Directors



Antti Jurvainen
Managing Director, finance
Liebherr-Norway AS



Håkan Nyhaugen
Managing Director, sales
Liebherr-Norway AS