



The Transparency Act

Statement on Due Diligence Assessments for Accon Group AS

Reporting period: January 1, 2024 - December 31, 2024



Accon's Values

At Accon, we believe in responsible business practices that create value for both people and society.

Our operations are based on respect for human rights, decent working conditions, and sustainable solutions.

We aim to contribute to a "good life" throughout the entire value chain and believe that everyone who delivers to or through us should have pay and working conditions that ensure dignity and security.

Openness, respect, and accountability are fundamental values in Accon's operations, and we are committed to following international standards for ethics and sustainability in practice—not just in principle.



Introduction

On July 1, 2022, the Transparency Act (the "Act on Enterprises' Transparency and Work with Fundamental Human Rights and Decent Working Conditions") came into force.

The purpose of the law is to promote respect for fundamental human rights and ensure transparency regarding how companies handle actual and potential negative impacts on people and workers. Accord Group AS is covered by the Transparency Act and fully supports its purpose.

For several years, we have worked systematically on responsible supplier follow-up and ethical guidelines. This statement documents our work in accordance with the law's requirements and our own corporate social responsibility.



Organization, Operations, and Responsibility

Scope of Operations

Accon develops and delivers industrial bulk packaging solutions to a variety of sectors in the Nordic region and selected international markets.

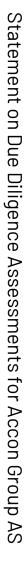
Our main segments include:

- The food, chemical, and pharmaceutical industries
- Process and mining industries
- Agriculture, minerals, and recycling

We have operational units in Norway, Sweden, Denmark, Finland, Estonia, and India.

Organization and Responsibility

The work on due diligence assessments is anchored in the Board of Directors and management and coordinated by the group's QESG function (Quality, Environment, Safety, Governance), led by the Chief Administrative Officer (CAO). The managing director in each subsidiary reports to the group CEO. The QESG team is responsible for implementation, reporting, and improvement activities.





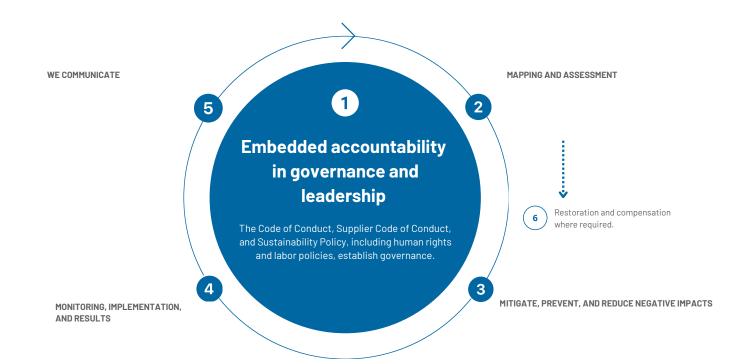
Guidelines and Tools

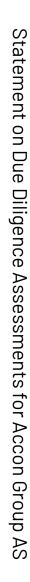
Accon has established a comprehensive framework for due diligence assessments, consisting of:

- Code of Conduct for all employees
- Supplier Code of Conduct with commitments for suppliers
- Sustainability Policy, including specific guidelines on human rights and working conditions
- Pre-assessments, questionnaires, and audit reports
- System for managing negative impacts
- Whistleblowing channel for critical concerns: https://www.accon.eu/About-us/Whistleblower

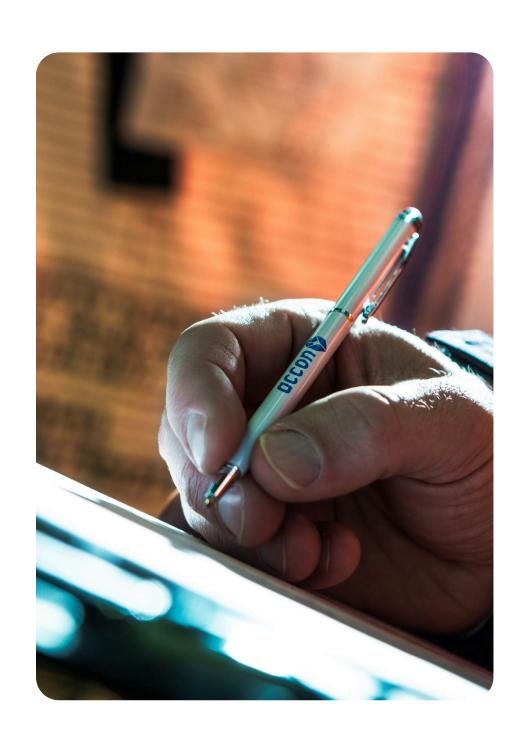
Our due diligence methodology is based on the OECD Guidelines for Responsible Business Conduct, and the assessments are carried out systematically as part of our continuous improvement and risk management processes.

In 2024, we have further improved and structured our tools to strengthen the assessment of both new and existing suppliers.









Due Diligence Assessments and Findings in 2024

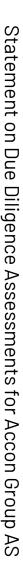
Method and Implementation

We conduct risk-based mapping and assessment of suppliers and business partners. This includes:

- Prequalification
- Assessment of geography, industry, and supplier type
- Document review and confirmation of compliance
- On-site audits and interviews, when necessary

Findings and Evaluation

- Geographic risk was identified in certain supplier tiers in India.
- No nonconformities were registered in 2024 among existing or prequalified suppliers.
- All suppliers operating in risk areas are followed up with documentation and/or site visits.





Commitments and Cooperation

Accon is a member of the following international initiatives and tools:

- UN Global Compact
- EcoVadis

We support and adhere to the principles of:

- The UN Universal Declaration of Human Rights
- The ILO Core Conventions
- The OECD Guidelines for Multinational Enterprises

Communication and Accessibility

This statement is available to all our stakeholders, including employees, suppliers, customers, and the public.

We respond to inquiries within a reasonable time, in accordance with the law's requirements.

Questions can be directed to our ESG team: qesg@accon.no

More information: <u>www.accon.no</u>

Tønsberg, June 30, 2025

Managing Director

M. Rabin
Chair of the Board

[∉] Board Memb