

2025 Transparency Act Due Diligence Statement for Vårgrønn AS

Vårgrønn AS is committed to responsible business conduct and compliance with the Norwegian Transparency Act (Åpenhetsloven). We actively work to identify, prevent, and mitigate adverse impacts on human rights and working conditions throughout our operations and supply chains.

Our due diligence process includes supplier assessments, stakeholder engagement, and ESG risk analysis, and we maintain robust governance through internal policies, certified management systems, and regular reporting aligned with international standards.

We disclose our findings and actions annually, ensuring transparency and accountability. Our efforts are guided by the OECD Guidelines and the UN Guiding Principles, and we collaborate with partners to drive continuous improvement.

For more information, please contact us through our website:

<https://www.vargronn.com/>

1. Company Commitment

Vårgrønn's commitment extends to all internationally recognised human rights and ensuring decent working conditions across our operations and supply chains, including those set out in the International Bill of Human Rights and the International Labour Organization's, Declaration on Fundamental Principles and Rights at Work. We align with UNGP and OECD Guidelines, and further details can be found in our [Human Rights Policy](#).

2. Due Diligence Process

We conduct regular due diligence assessments to identify and address potential adverse impacts. This includes supplier questionnaires and screenings. Where risks are identified the assessment may be expanded to include, inter alia, interviews, site visits, and ESG risk evaluations.

3. Governance and Policies

Our governance framework includes a dedicated sustainability committee, a comprehensive code of conduct, and a supplier code of conduct. As an ISO 9001 (quality) and ISO 14001 (environmental) certified organisation, we are committed to full compliance with international standards, regulatory requirements, and best practices to ensure continuous improvement, environmental responsibility, and ethical business conduct across our operations and supply chain.

4. Reporting and Transparency

We report annually on our sustainability performance, including compliance with the Transparency Act. Our disclosures are submitted to and made available to stakeholders

5. Continuous Improvement

We continuously refine our processes through collaboration with external partners and participation in initiatives such as the UN Global Compact and Responsible Business Alliance.

6. Measures to Mitigate Risks in the Supply Chain

In addition to risk mitigation measures outlined in our Annual Report, we are to implement the use of Achilles <https://www.achilles.com/en-uk/> from Q4 2025 to ensure that we build resilient, compliant supply chains and meet non-financial reporting obligations through trusted data, collaboration, and actionable insight.

This will enable us to better:

- understand and manage supply chain risk
- strengthen our compliance with audits and assessments
- streamline non-financial reporting
- manage our carbon impact
- access strategic guidance on ESG

7. Whistleblowing

At Vårgrønn, we encourage our team members and external parties who work with us to report any conditions or actions that breach our Code of Conduct, or other policies, procedures and rules.

Being alerted to information about negative conditions or actions allows us to improve. This is important both for the company and for the society we are part of.

In Vårgrønn, team members or external parties can report concerns in several ways:

- **Our Whistleblowing Channel:** Contact our law firm, Advokatfirmaet Schjødt AS, by phone +47 401 01 305 or by email at whistleblowing.vargronn@schjodt.com.
- **Our Compliance Officer:** Email Vårgrønn's Compliance Officer Kjersti Kristensen at compliance@vargronn.com.

8. Company Structure

Our owners

Plenitude, a company 100% owned by Eni, operates in the energy market with a distinctive business model that integrates renewable production, energy sales and solutions and a wide network of charging points for electric vehicles.

HitecVision is a leading European energy investor and entrepreneur with EUR 8 billion of assets under management. HitecVision is headquartered in Stavanger, Norway, with other offices in Oslo, London and Milan.

9. Looking Ahead

Vårgrønn is committed to promoting fundamental human rights and decent working conditions in our operations and supply chain. Within the Company, we continue to improve the quality and measurement of our compliance training for employees and with respect to our suppliers, we aim to implement improved risk assessment tools to better visualise our supply chain risks. As risk is ever evolving, we will evaluate and modify our policies and procedures accordingly.

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Stephen M. Bull CEO

This statement was approved by the Vårgrønn Board of Directors on 25 September 2025.