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# Transparency Act Statement 2024



This report relates to Geminor AS (herein Geminor), a subsidiary of Geminor Invest AS. Geminor provides services in waste treatment, logistics, material recycling, and waste for energy production. We handle over 2,4 million tons of waste annually, with an annual turnover of approximately 2.8 Billion NOK.

Founded in Karmøy, Norway, in 1994, the company now has offices and treatment facilities in nine different countries (France, UK, Germany, Italy, Poland, Denmark, Sweden, Finland, and Norway), employing a total of more than 140 professionals and experts. Geminor holds contracts with around 360 waste producers and 260 incineration and recycling plants.

Organizationally, each country has a country manager who reports directly to the Chief Operating Officer (COO). Geminor AS is owned by Vikingstad AS and Schöpwinkel Holding AS. The board consists of three members, the chairman of the board being Truls Gautesen. The Chief Financial Officer (CFO), Chief Digital Officer (CDO), Chief Quality Officer (CQO) and COO all report directly to the CEO. The CFO manages the finance, HR and Communications departments, the CDO; all software development, and the CQO; the QHSE department, and ESG, which are all managed at a group level to support each country manager.

In accordance with the Norwegian Transparency Act, Geminor is committed to upholding high standards of human rights and working conditions across our operations and supply chains. Our due diligence processes are designed to identify, prevent, and mitigate adverse impacts on human rights and working conditions.

We conduct our business in line with the UN OECD guidelines for responsible business conduct and have articulated our commitments to human rights and sustainability in our Standard Code of Conduct, available on our website. This includes adherence to the United Nations Guiding Principles on Business and Human Rights, The European Convention on Human Rights, the United Nations Convention on the Rights of the Child, and the conventions of the International Labour Organization (ILO Conventions).

Geminor uses its ISO certifications ISO14001:2015, ISO 9001:2015, and ISO 45001:2018 to help guide its risk management and due diligence according to the Transparency Act. Our comprehensive risk assessments help us identify potential human rights and labour rights violations within our operations and supply chains. To manage these risks, we have implemented several measures, including supply chain mapping, development of a new onboarding procedure, and management of risks via our ISO-9001-certified quality management system.

In 2023/2024, we have taken further steps to mitigate identified risks. These include establishing a Code of Conduct for all suppliers and partners, and a new onboarding procedure for highest



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risk suppliers, reviewing our Transparency Act procedure, whistle-blower policy, and equality policy annually, and investing in a new HR management system to safeguard our staff.

Geminor is committed to transparency and will release its annual sustainability report in September 2024 providing a detailed account of our impact and commitment to human rights due diligence.



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