Transparency Act statement

This statement relates to Geminor Invest AS. Geminor Invest AS is the ultimate parent company of the Geminor Group and has no employees or independent operating activities.

The Group's operating activities are carried out through Geminor Trading AS and its subsidiaries. Geminor Trading AS is responsible for the Group's operating activities, including activities related to waste treatment, logistics, material recycling, and waste-to-energy recovery.

This statement covers Geminor Invest AS as the ultimate parent company. The operational due diligence work, risk assessments, policies, supplier follow-up, and improvement measures are carried out at group level through Geminor Trading AS and its subsidiaries.

This statement covers the reporting period from 1 January 2025 to 31 December 2025.

Geminor Invest AS is committed to respecting fundamental human rights and decent working conditions in accordance with the Norwegian Transparency Act. As a holding company without employees or operational activities, Geminor Invest AS exercises its responsibility through ownership, governance, and board oversight of the Geminor Group.

Geminor Invest AS follows up the Group's work with fundamental human rights and decent working conditions through ownership, governance, and board oversight. As a holding company without employees or independent operational activities, Geminor Invest AS does not conduct separate operational due diligence processes. Instead, Geminor Invest AS reviews and follows up the group-level due diligence work established and implemented by Geminor Trading AS and its subsidiaries.

These processes are designed to identify, prevent, mitigate, and account for actual and potential adverse impacts on fundamental human rights and decent working conditions in the Group's operations, supply chains, and business relationships.

Geminor Trading AS has prepared a separate Transparency Act statement covering Geminor Trading AS, its subsidiaries, and Geminor's operations in Europe. That statement describes the Group's operational structure, policies, due diligence processes, identified risk areas, measures, and planned improvements in further detail and is available on Geminor's website.

During the reporting period, no separate human rights or decent working conditions risks have been identified in Geminor Invest AS itself, as the company has no employees and no independent operational activities. Potential risks are related to the Group's operating activities and supply chain and are addressed through the due diligence work carried out by Geminor Trading AS and its subsidiaries.

The Board of Geminor Invest AS has reviewed the relevant group-level due diligence work and confirms that Geminor Invest AS will continue to follow up human rights and decent working conditions through its ownership and governance of the Geminor Group.

This statement is reviewed annually and updated as necessary.

Date: 04.06.2026

Signatures:
Approved and signed on behalf of
Geminor Invest AS

Eilef Stange

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Eilef Stange, Chair of the Board
Geminor Invest AS

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