



Transparency Act Statement ENG

This statement relates to Geminor Trading AS and its subsidiaries, herein referred to as Geminor. Geminor Trading AS is responsible for the Group’s operating activities and holds the Group’s operating subsidiaries.

This statement covers Geminor Trading AS, its subsidiaries, and Geminor’s operations in Europe. Through its subsidiaries and operations in Europe, Geminor provides services within waste treatment, logistics, material recycling, and waste-to-energy recovery.

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

The group handles more than 2 million tonnes of waste annually and has an annual turnover of approximately NOK 2.8 billion.

Geminor was founded in Karmøy, Norway, in 1994. Today, the group has offices and treatment facilities in nine countries: Norway, Sweden, Denmark, Finland, Poland, Germany, Italy, France, and the United Kingdom. The group employs 149 professionals and works with a broad range of waste producers, incineration facilities, recycling facilities, logistics providers, and other business partners across its value chain.

Organisationally, each country is led by a Country Manager, who reports directly to both the Chief Operating Officer and the Chief Commercial Officer. Chief Financial Officer, Chief Digital Officer, Chief HR & QHSE Officer, Chief Operating Officer, and Chief Commercial Officer all report directly to the Chief Executive Officer.

The Chief Financial Officer is responsible for the finance department, the Chief Digital Officer oversees software development, and the Chief HR & QHSE Officer is responsible for the HR and QHSE departments. ESG is organised under the Director of Innovation and Sustainability, who reports to the Chief Commercial Officer.

HR, QHSE, ESG, finance, and digital functions are managed at group level to support the Country Managers and to promote consistent standards, policies, and processes across the organisation.

In accordance with the Norwegian Transparency Act, Geminor is committed to respecting fundamental human rights and decent working conditions across its own operations, supply chains, and business relationships. Our due diligence processes are designed to identify, prevent, mitigate, and account for actual and potential adverse impacts on human rights and working conditions.

Geminor conducts its business in line with the OECD Guidelines for Responsible Business Conduct. Our commitments to human rights, responsible business conduct, and sustainability are reflected in our Standard Code of Conduct, which is available on our website. The Code of Conduct refers to internationally recognised principles and standards, including 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.

Training on key policies, including the Code of Conduct, Whistleblowing Policy, and Anti-Bribery Policy, is provided to employees and forms part of the onboarding process for new employees. Relevant policies are also made available to suppliers and contractors through our website.

Geminor uses its ISO certifications (ISO 14001:2015, ISO 9001:2015, and ISO 45001:2018) to guide risk management and due diligence in line with the Transparency Act. Where relevant, we also utilise recognised certification schemes such as FSC and PEFC to support responsible sourcing and supply chain traceability.

We have continued to develop our HR management system (HiBob) to support and safeguard employees through enhanced HR policies, structured onboarding and record-keeping, employee engagement surveys, and improved visibility of workforce data to support wellbeing, compliance, and effective people management.

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During the reporting period, we achieved PEFC certification, supporting responsible sourcing and improved supply chain traceability. In addition, enhancements to the risk assessment module within our management system are being developed to strengthen the identification and management of human rights and labour-related risks.

Through our ongoing work, we have identified potential risks related to working conditions within parts of the waste management value chain, including subcontracted activities and a range of operational environments across our business. These include areas such as health and safety practices and communication and are prioritised based on severity and likelihood. We have also identified areas where our processes can be strengthened, particularly in relation to supplier due diligence and risk monitoring and are implementing a more structured and automated system for supplier assessment and monitoring to improve oversight and consistency across our supply chain.

We monitor the effectiveness of our measures through ongoing review of risk assessments, supplier engagement, and internal reporting processes, and will continue to refine our approach as our systems develop.

Geminor is committed to transparency and will publish its annual sustainability report during 2026, providing further detail on our approach to human rights, due diligence, and responsible business practices.

This statement has been prepared by Geminor Trading AS and covers Geminor Trading AS, its subsidiaries, and Geminor’s operations in Europe. It has been approved and signed on behalf of Geminor Trading AS by its Chair of the Board and Chief Executive Officer.

Date: 04.06.2026

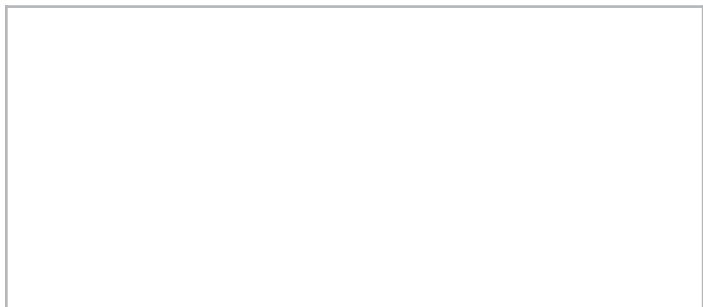
**Approved and signed on behalf of
Geminor Trading AS**

Håvard Framnes
Chair of the Board/Chief Executive Officer
Geminor Trading AS

Verification

Document ID 09222115557581815809

Signatories



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