

Statement of modern slavery

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 and relates to Geminor Trading AS and its subsidiaries, herein referred to as Geminor.

Geminor Trading AS is responsible for the Group's operating subsidiaries and reports to the Board of Geminor Invest AS. Geminor Invest AS is the ultimate parent company of the Geminor Group and has no employees.

This statement covers Geminor Group's operations and supply chains, including its UK operations and relevant UK legal entity/entities. Through its subsidiaries and operations in Europe, the Group provides services within waste treatment, logistics, material recycling and waste-to-energy recovery.

Since its formation in 2004 Geminor has grown to have over 2 million tonnes of material under its management per year. Geminor holds supply contracts with Waste to Energy facilities across several countries. We have strong established relationships with key international logistics providers across Northern Europe, providing solutions by standard road trailer, containerised freight, bulk vessel and rail. The end of the financial year across Geminor Group is December 31st.

The Geminor Group is fundamentally opposed to forced labour, child labour, human trafficking and all other forms of modern slavery and labour exploitation.

Geminor is committed to operating its business in an ethical and responsible manner and we expect our contractors and suppliers to do the same. 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.

Our approach to ensuring our business, including that of our suppliers and contractors, is free of modern slavery comprises the following measures:

- ☐ Several key policies are in place for identifying and preventing slavery and human trafficking in our operations, including our Code of Conduct and Whistleblowing policies. Our Code of Conduct and Whistleblowing policies apply to, and are accessible by, our suppliers and contractors via 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. The Code of Conduct applies to all employees and extends to our suppliers and contractors, who are expected to adhere to the same standards.
- ☐ Training on key policies is provided to all employees, and forms part of the new employee induction process.
- ☐ Audits have been carried out on key suppliers and contractors to ensure the requirements set out in the Code of Conduct are being met.
- ☐ Due diligence and risk assessments are carried out in relation to our operations and supply chain, using structured processes to help identify and address potential risks, including those related to labour practices and working conditions.
- ☐ Geminor operates in line with the Ten Principles of the UN Global Compact. Principles 1, 2, 4 and 5 are particularly important for our Modern Slavery declaration aiming to ensure that human rights are not violated and that all forms of forced labour are eliminated.

We strive to make continuous improvements, and our objectives for 2026 are:

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- ☐ Implementation of a more structured and automated system (Factline) for supplier assessment and monitoring, with the aim of improving oversight and consistency across our supply chain.

Geminor shall review and develop this approach on an annual basis.

This statement is approved by the board, and is approved and signed by:

Håvard Framnes CEO Date: 04/06/2026