

Transparency Act Statement for 2024

Glamox is unwavering in its commitment to preventing modern slavery and human trafficking in all its business activities and supply chains. This statement outlines the steps we have taken and continue to take to ensure that the potential and actual threats to human rights and working conditions are not occurring within our organization or our supply chains. We recognize our responsibility to uphold human rights and are dedicated to maintaining the highest ethical standards in all our operations.

This statement has been prepared to comply with the legal requirements in the Norwegian Transparency Act 2021 section 5, cf. section 4 and constitutes Glamox' transparency statement for the financial year ending 31 December 2024. Glamox also issues its [Modern Slavery Statement](#) annually.

About Glamox

Glamox is a global group of companies that develops, manufactures and distributes professional lighting solutions for the global market. Glamox is a leading supplier to the world's marine and offshore markets, and a leading supplier to the professional building market in Europe.

The Group is headed by Glamox AS, a Norwegian limited liability company registered in Molde and headquartered in Oslo, Norway. The Glamox Group is a global organization with around 2,000 employees and with sales and production in several European countries, as well as in Asia and North America. We have divided the operations between three divisions: Professional Building Solutions, Marine, Offshore and Wind and Sourcing, Production and Logistic. The Sourcing, Production and Logistics division plays a central role in the procurement of components and finished goods. The division operates production units and warehouses at several locations in Europe, North America and in China.

Expectations of our suppliers

Glamox acknowledges that an organization can be associated with negative social impacts either through its own activities or through its business relationships with other entities. Sustainability is a fundamental aspect of all procurement activities, and we establish clear human rights expectations and requirements for all our suppliers. Glamox requires its suppliers to adhere to the obligations outlined in our Code of Conduct and Responsible Business Partner Policy, with a particular emphasis on child or forced labor, human trafficking, slavery, and any actions that undermine human dignity and respect. Social standards are also integral to our contractual relationships and order placements, and they are reviewed as necessary. Our Procurement agreements include clauses on auditing rights and the suppliers' responsibility to actively promote the same requirements within their supply chains.

Our suppliers are contractually obligated to take effective measures to ensure compliance with the United Nations Guiding Principles on Business and Human Rights. They are requested take all reasonable steps to avoid, or appropriately address and remedy, including through the establishment of suitable grievance mechanisms, any adverse impacts on human rights that the supplier may cause or contribute to. Additionally, they must take reasonable steps to prevent or mitigate adverse human rights impacts in their operations, products, or services directly linked through a business relationship.

Suppliers who do not fully meet our standards receive support from our procurement team to identify areas for improvement and develop actionable plans to address any deficiencies. Our goal is to ensure that all suppliers meet our stringent requirements and uphold the highest standards of ethical conduct and compliance. If deviations from the Glamox Code of Conduct, Responsible Business Partner Policy, or contractual requirements are detected, Glamox will investigate further and ensure that necessary actions are taken.

Human rights due diligence

Glamox employs a risk-based approach to identify potential human rights impacts in the supply chain, as outlined by the OECD Due Diligence Guidance for Responsible Business Conduct, and this is integrated into our risk management systems. Consequently, initial human rights due diligence is incorporated into relevant business processes when onboarding new suppliers and business partners, and we continuously monitor our suppliers. In line with our risk-based approach, we aim to conduct more thorough human rights impact assessments with mitigating action plans where there is a higher risk

of adverse impacts due to the volume of expenditures, the supplier industry, and the risk of human rights violations in the supplier's country.

Human rights areas monitored in the supply chain include safe and decent working conditions, health, discrimination, freedom of association, and collective bargaining. We also monitor the risk of incidents of child labor abuse, compulsory or forced labor. Additionally, our suppliers are required to comply with the conflict mineral reporting template issued by the Responsible Mineral Initiative.

Glamox conducts human rights due diligence in line with the OECD Guidelines and Section 4 of the Norwegian Transparency Act. Our approach includes six key steps:

1. **Establishing Responsible Business Conduct Policies and Management Systems**
Human rights expectations are embedded in our Code of Conduct and Responsible Business Partner Policy. Suppliers are contractually required to comply with international standards and establish grievance mechanisms and remediation plans.
2. **Identifying and Assessing Actual or Potential Adverse Impacts**
We assess human rights risks during supplier onboarding and through continuous monitoring, focusing on working conditions, discrimination, child and forced labor, and conflict minerals.
3. **Ceasing, Preventing, or Mitigating Adverse Impacts**
Identified risks are addressed through improvement plans and regular follow-up. Suppliers who do not meet our standards receive support from our procurement team to implement targeted improvement plans. Our contracts also include audit clauses and obligations for suppliers to cascade requirements through their own supply chains.
4. **Tracking Implementation and Results**
IntegrityNext is used to monitor supplier compliance, flag issues, and ensure certificates and risk data are up to date. High-risk suppliers are reviewed more closely.
5. **Communicating How Impacts Are Addressed**
We report on our due diligence annually and engage with stakeholders upon request. In addition, we remain open to stakeholder inquiries and provide contact information for further engagement (compliance@glamox.com). In case of identified risks, we disclose how they are managed.
6. **Providing for or Cooperating in Remediation Where Appropriate**
Where Glamox causes or contributes to harm, we take corrective action. If adverse impacts are linked to us via business partners, we use our leverage to encourage remediation and may provide support or escalate issues to enforcement authorities if necessary.

Supplier Qualification and Due Diligence

Our suppliers undergo a rigorous qualification process, which includes risk mapping. Due diligence is conducted through background checks and screening of our suppliers. In 2021, we began screening our direct suppliers using IntegrityNext, a digital cloud-based platform that covers topics such as ethical behavior, health and safety, management and ownership (screening against sanction lists), compliance with human rights, and screening against critical news. We continue using the same solution in 2024. The system automatically detects critical news, changes on sanction lists, certificate expirations, and incomplete or missing information, alerting responsible personnel at Glamox. It also hosts the suppliers' applicable ISO certificates, confirming each type of compliance.

The assessment of our suppliers' sustainability ratings is conducted systematically and is now a mandatory requirement for all our direct suppliers. Suppliers with a red or yellow status are closely monitored to improve their status. These suppliers must develop improvement plans, and audits (on-site or online) are used to monitor critical aspects, discuss them with our suppliers, and close any gaps.

Glamox has approximately 3,870 suppliers in total. Of these, approximately 97% of our direct spend suppliers were screened. Monitoring via IntegrityNext has been extended to include critical suppliers from the Indirect purchasing category, and by the end of 2024 we have screened 147 different indirect suppliers. Glamox will continue its screening process for both direct and indirect suppliers using IntegrityNext.

Tail suppliers are assessed by country and industry risk.

The use of IntegrityNext enables us to exclude suppliers connected to sanctioned parties, components originating from non-whitelisted smelters, or suppliers associated with human rights violations. A similar

procedure is applied to our customers to comply with export regulations and sanction laws. To date, no agreements have been terminated as a result of screening.

The main reasons for remarks were incomplete or missing information or expired certificates related to environmental protection, Human & Labor Rights, and Health & Safety. If we identify any concerns related to these issues, we conduct a more comprehensive review or audit of the potential supplier to determine if they meet our requirements before any agreements are signed. In 2024 we conducted 25 on-site supplier audits, all of which included topics related to HSE, human rights, and working conditions. If adverse impacts are detected, we will report how we are working to mitigate or remediate these potential or actual adverse impacts.

Glamox is dedicated to fostering a transparent and inclusive work environment where employees and third parties can safely report serious misconduct. Since 2022, our Whistleblowing Policy has featured an external web-based platform, the Glamox whistleblowing channel, enabling employees and suppliers to anonymously report any violations, including significant irregularities related to breaches or suspected breaches of laws, regulations, or the Glamox Code of Conduct. This encompasses violations of human and labor rights, such as the right to freedom of association, recognition of collective bargaining rights, and the prohibition of forced, compulsory, and child labor.

Glamox has not detected significant adverse impacts in our supply chain through our due diligence processes, including our grievance mechanisms. However, we recognize higher risks associated with deliveries from Chinese suppliers in terms of electronic components, which may contain metals originating from defined conflict minerals (tin, tantalum, tungsten, and gold). This is addressed in our supplier screenings, supplier agreements, supplier audits, and regular dialogue with the suppliers, and we seek ways to mitigate our impact when and where relevant.

Glamox' due diligence did not detect actual adverse impacts or significant risks of adverse impacts related to fundamental human rights and decent working conditions in our own operations in 2024. If Glamox has caused or contributed to an identified adverse impact related to human and labor rights, Glamox will provide a remedy. In cases where Glamox has not caused or contributed to such an impact but may still be linked to this impact through a business partner, Glamox may still take a role in remediation. For example, to the extent practical, Glamox may use its leverage on the business partner to incentivize starting

a remediation process. Where relevant, Glamox may also provide information to facilitate investigations or dialogue. In more extreme cases, Glamox may need to report to enforcement authorities.

If you would like to find out more about the above, please email to compliance@glamox.com

Board Approval

This statement was approved by the board of directors of Glamox AS on the 24th of April 2025, and it is signed by the board and the CEO.

Oslo, 24th April 2025

Mikael Aro,
Chair of the board

Arild Nysæther
Board member

Joachim Espen
Board member

Hanna-Maria Heikkinen
Board member

Helene Egebøl
Board member

Lars Ivar Røiri
Board member

Henny S. Eidem
Board member

Sigmund Johansen
Board member

Espen Ytterstad
Board member

Daniela Pandrea
Board member

Astrid Simonsen Joos, CEO