



# KOMPLETT ASA – TRANSPARENCY ACT ACCOUNT

## INTRODUCTION

The Transparency Act shall promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure the public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions.

The act imposes three main obligations on companies: a duty to carry out due diligence in accordance with the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (hereafter OECD guidelines), a duty to account for due diligence and a duty to answer information requests.

Komplett ASA ("Komplett Group") is committed to the protection of internationally recognised human rights and fair and ethical work practices. The company complies with all applicable laws and regulations, including the Norwegian Transparency Act.

Komplett and its subsidiaries are committed to the duty to inform the public and the duty to carry out due diligence in accordance with the OECD guidelines in the Norwegian Transparency Act: Since 2022, the company has worked according to the requirements in the Act and thus; (1) actively worked to embed accountability in the organisations' policies, (2) mapped and assessed the actual and potential impacts on fundamental human rights and decent working conditions that the company's operations have either caused or contributed to, or have been directly linked with in its operations, products or services via the supply

chain or business partners, (3) implemented measures to stop, prevent or limit negative impacts based on the organisation's priorities and assessments, (4) followed up on the implementation and results of the measures through the annual due diligence assessments, (5) communicated its impacts with both the public and affected stakeholders through an annual account that is easily accessible on the organisation's website, and finally (6) restored the damage if the company has caused or contributed to actual negative consequences. Komplett Group is committed to continue this work toward a responsible working life.

## About the account

This account has been prepared in accordance with the Transparency Act. It summarises Komplett Group's governance, policies, and procedures regarding the protection of human rights and decent working conditions, as well as risks identified in the due diligence assessment and measures to mitigate these risks. The report is aligned with the guidelines by the Norwegian Consumer Authority (Forbrukertilsynet).

Komplett Group and four subsidiaries are covered by the act's obligations: Komplett Services AS, Komplett Distribusjon AS, NetOnNet AB, Ironstone AS.

Webhallen AB, Komplett Services Sweden AB and Komplett Distribution Sweden AB are not affected by the act directly, but as all activities in Komplett Group are to be assessed, they are included in the group due diligence assessments. Accounts of the due diligence carried out by the subsidiaries are to be found in the appendix.

## ABOUT KOMPLETT GROUP

Komplett Group is the largest online first electronics retailer in the Nordic area and offers its customers one of the market's broadest selections of consumer electronics and business solutions. The group operates an efficient and scalable business model and is widely recognised for having an industry leading cost position.

The group serves customers in the B2C, B2B and distribution segments. Komplett Group's operations in the B2C segment cover sales to private consumers across Norway, Sweden and Denmark through the brands Komplett, NetOnNet and Webhallen. The customers were in 2023 served by ten webshops, 17 physical stores and 31 complementary self-service, logistics and warehouse shops. In early 2024, Webhallen closed five stores.

Komplett B2B is an online player market for corporate customers in the Nordics focusing on the small and medium sized enterprises and small office and home office segments. Komplett B2B offers its customers a fully digital customer journey through its web shops [Komplettbedrift.no](https://komplettbedrift.no) and [Komplettforetag.se](https://komplettforetag.se) and serving the Norwegian and Swedish market, respectively.

The group's activities in the distribution segment consist of large-scale distribution contracts for sale to resellers and other big entities not covered by B2B, which are operated under the Itegra brand and its own platform. With its flexible logistics and delivery platform, the group is at the forefront when it comes to same day delivery and last-mile service from its warehouses in Sandefjord, Norway, and Stockholm and Borås, Sweden.

In 2023, the group had 1 561 employees (headcount). Komplett Group is headquartered in Sandefjord, Norway, and listed on the Oslo Stock Exchange.

### Subsidiaries

Komplett Services AS (“Komplett”) provides consumer electronics on the platforms Komplet.no, Komplet.se and Komplet.dk. The company delivers to the B2B market in Norway and Sweden through Kompletbedrift.no and Kompletforetag.se.

Komplett Distribusjon AS (“Itegra”) holds the group’s activities in the distribution segment. Itegra is present in Norway and Sweden and serves its customers through the websites Itegra.no and Itegra.se.

Webhallen AB (“Webhallen”) is an omnichannel provider within consumer electronics, with the online platform Webhallen.com and 17 retail stores and pick-up points in Sweden. In early 2024, Webhallen closed five stores. The company was acquired by Komplett Group in 2013.

NetOnNet AB (“NetOnNet”) has two online shops in Sweden and Norway, NetOnNet.se and NetOnNet.no, and a total of 31 complementary self-service, logistics and warehouse shops located in Sweden and Norway. The company was acquired by Komplett Group in 2022.

Ironstone AS (“Ironstone”) is a 100 per cent cloud company helping businesses with IT solutions ranging from software to customer service. The company was acquired by Komplett Group in 2021.

Through the subsidiaries Komplett Group produce and sell a range of private labels. For

more information about the subsidiaries and private labels, please see the appendix.

### Commitment to work with human rights and decent working conditions

Komplett Group and its subsidiaries value respect for basic human rights and fair work conditions in their own operations as well as with its business partners throughout the value chain.

An important prerequisite for the well-being and safety in our own operations is respect for the fundamental human rights of our employees. Komplett Group fully supports the right of any employee to form and join trade unions within the organisation and recognise the value of collective bargaining as enshrined in the International Labour Organisation’s Core Convention.

In Norway employees are affiliated to EL & IT Forbundet and Fellesforbundet. The cooperation between trade unions, employers and the authorities are maintained through regular cooperation meetings with union representatives to discuss rules on issues such as recruitment and dismissal, working hours, salary practices, sick leave, and parental leave. Responsible working conditions is also followed up through management and measurement related to working hours, salary practices and employee satisfaction surveys.

In Sweden, employees are affiliated to Unionen (administrative employees) and Handels (“store and warehouse” employees), while Komplett Group is a member of NHO Service, Virke (in Norway) and Svensk Handel (in Sweden). The collective agreements between the unions and the employers’ associations apply accordingly.

The group understands that there is a greater chance of human rights violations and low-quality work environments when dealing with suppliers in China. While Komplett is a small customer for most of its factories, it recognises that it has a possibility to influence its suppliers, in particular in relation to the company’s private label products. In 2023, NetOnNet had commercial agreements with 196 suppliers in China. The Supplier Code of Conduct was a key component in these agreements.

### Physical factory audits

Compliance with human rights and decent work conditions is also assessed through ongoing physical inspections during factory audits. The aim is to inspect each factory at least once every two years.

Until the end of 2023, NetOnNet had primary responsibility for inspections and follow-up on suppliers of the subsidiary’s private label. An updated inspection protocol based on the standards from ISO 9001 and the CSR audit based in BSCI Code of Conducts are used during these physical audits. The protocol includes approximately 70-90 questions for each of the three areas: Corporate Social Responsibility (CSR), Quality Management System (QMS) and Environmental Management System (EMS). The QMS and CSR were updated in 2021 and the EMS in 2023. Going forward, this work will continue as a part of the centralised procurement process within Komplett Group.

The procurement department aims to inspect about 70 suppliers by 2024 following the new inspection protocol. The company’s local dele-

gation in China will do this work, as the employees know the local situation well.

In addition to physical factory audits, the group aims to provide suppliers that did not meet the requirements when audited, with guidance in order to helping them reach the highly set quality standards. During 2024, the procurement department at group level will expand its auditing to include tier 2 suppliers as well. The company's suppliers shall not use subcontractors that are not approved by NetOnNet, and the group will continue to focus the efforts on increasing transparency and overview at all stages of the supply chains to safeguard the people affected by the business.

### Key measures initiated by the entire organisation in 2023

Komplett Group works closely with its subsidiaries to promote its sustainability initiatives. Below is a summary of the organisation's key efforts to mitigate its negative impact on human rights and decent working conditions across its operations, with business partners and throughout the value chain in 2023:

- ▶ The Supplier Code of Conduct has been standardised at group level to manage significant impacts on workers in the value chain.
- ▶ The group centralised the procurement department to streamline operations, enhance control, and ensure consistent compliance with the supplier code of conduct at group level.
- ▶ The process of mapping the risks associated with Komplett Group's and its subsidiaries' suppliers was initiated in August 2023. All tier 1 suppliers at group and subsidiaries

have been mapped (see more about supplier screening on [page 5](#)).

- ▶ The local NetOnNet team in Guangdong conducted 67 physical factory audits of the company's private label suppliers in China. The outcome resulted in the termination of collaboration with seven audited factories who failed to comply with the organisation's standards (for further information, refer to NetOnNet's Transparency Act Report in appendix, on [page 11](#)).
- ▶ The management hired a legal & compliance director in Komplett Group and a quality & compliance director in Komplett Services as additional resources to strengthen the company's ESG-work, including supplier assessments. (For further information, refer to Komplett Services and Komplett Distribution's Transparency Act Report in appendix, [page 9](#)).

In 2024, the group will continue its efforts in increasing transparency and overview at all stages of the supply chains to safeguard the people who are impacted by the Komplett Group's business.

The group commitments apply to all subsidiaries and private labels.

### GOVERNANCE OF HUMAN RIGHTS AND DECENT WORKING CONDITIONS

To ensure responsible business practices at group level, the management centralised the procurement department in 2023. Four category directors have been appointed, as well as one group business director who will be responsible for group agreements, private label and supplier onboarding and follow-up. The centralisation will strengthen our work

related to the supply chain. This is an ongoing process that will proceed throughout 2024.

### Responsibilities

In Komplett Group, sustainability permeates all operations and the organisational structure, from top-level board and management to all levels of the organisation. The board of directors has been informed of the Transparency Act and the duties connected to the law.

The group CEO is responsible for the group and the subsidiaries complying with the duties as set out in the act. The group CFO is involved in overseeing these efforts and has the ultimate responsibility for corporate governance, including the oversight of strategic planning, review of strategic processes and sustainability reporting. The director legal & compliance of the group has the operational responsibility that the group conducts due diligence on human rights and decent working conditions. This is done in collaboration with the subsidiaries.

Each subsidiary has the responsibility to make sure due diligence and supplier assessments on human rights and decent working conditions is conducted in line with the act and the OECD guidelines. For more information about responsibilities in the subsidiaries, please see the accounts in the appendix.

### Policies and governing documents

In 2023, Komplett Group integrated human and labour rights into the core business principles and processes that govern how the company at group level and how the subsidiaries strategies, make decisions and carry out their work daily. Where applicable, the standards and

policies have been updated based on internationally recognised initiatives such as the principles of the UN Global Compact, the OECD guidelines, and the United Nations Convention against Corruption.

One of the main actions in 2023 to manage the significant impacts on workers in the value chain was the standardisation of the Supplier Code of Conduct at group level. Now, Komplet Group's Framework Agreement for Purchasing Goods is consistent with the UN Universal Declaration of Human Rights, the ILO's (International Labour Organisation) eight core human rights conventions on working life, the Convention on the Rights of the Child, UN Global Compact, and the OECD guidelines. The CEO of Komplet ASA approved the updated policy and it is included as a standard purchasing policy in all new supplier agreements signed at group level.

Our Internal Code of Conduct and Anti-Corruption and Bribery Policy set out our zero-tolerance policy on bribery and corruption. Through the Learnifier training platform, all employees at Komplet shall undergo regular training on corruption risk and business ethics. These newly updated policies will be signed by all employees by Q2 2024.

For an overview of the different policies, governing the operations of the Komplet Group level and its subsidiaries, please see Komplet Group's Sustainability Report 2023 in the Managing material matters chapter.

### Whistleblowing

Komplet Group recognises the right of any employee to report any misconduct related to

the company. The company is also responsible for ensuring that whistleblowers are not subject to direct or indirect sanctions.

The company's whistleblower channel facilitates anonymous reporting and is overseen by an independent third party. The channel is available to employees through the intranet website. Concerns raised through this channel are handled in accordance with established whistleblower procedures and can relate to any area, including human and labour rights.

A whistleblower group is responsible for addressing reports of misconduct. All reported concerns are investigated to determine the root causes and assess appropriate corrective and preventive actions. This may include the involvement of relevant authorities as required, such as trade union representatives, or a legal counsel.

The whistleblowing channels and procedures described above are also implemented in the subsidiaries of Komplet Group.

### DUTY TO PROVIDE INFORMATION

In accordance with the reporting obligation set forth in the Transparency Act, the company will publicly report on its due diligence assessments on its website. In accordance with the obligation to provide information, the company and subsidiaries also respond to information requests from business associates, journalists, and other stakeholders on how the company works with due diligence assessments to ensure respect for human rights and decent working conditions.

The company received no inquiries in 2023.

### DUE DILIGENCE WITH RESPECT TO HUMAN RIGHTS AND DECENT WORKING CONDITIONS

Komplet Group values transparency as a key component to ensure that the products sold are of high quality and are manufactured in safe conditions with no violations of human and labour rights. The group aims to implement a risk-based supply chain mapping throughout all subsidiaries to identify potential risks and ensure compliance with commitments and standards during 2024.

#### Supplier screening

All tier 1 suppliers at group and subsidiaries have been mapped, more than 1 000 in total, in addition to approximately 1 500 business partners. The risk level has been set based on geography, product/service type and raw materials.

The risk assessment emphasises that the production of electronic components, metals and plastics poses an increased risk of human rights violations. Komplet and its suppliers, particularly in China, face concerns regarding forced and child labour. Further, mining and mineral sourcing, especially for lithium and microchip materials, involve risks for workers, including harsh conditions, noise, long hours, and vibrations. The working conditions for the transportation and logistics industry are also considered to have a higher risk of human rights violations.

Komplet Group can influence this by ensuring appropriate policies and contractual commitments with suppliers are in place. Efforts to eliminate child and forced labour can include identifying suppliers beyond tier 1, conducting due diligence and audits or by more directly

addressing the root causes by engagement with the affected communities. Training, communication, and awareness-raising programmes are also important measures to mitigate human rights violations.

In determining mitigating actions based on the risk assessment, the company recognises that it has the most influence over the suppliers of its own private label products and the choices regarding downstream transportation. In 2023, all new suppliers associated with Komplet Group's private label were screened using social criteria based on international guidelines. The screening allows the group to assess whether the suppliers comply with relevant laws and regulations, as well as ethical standards, including labour rights, human rights, and decent working conditions. The screening involves quality criteria as well, and in addition the specific products are tested upon delivery.

The work on further risk assessment and elaborating mitigating actions will continue in 2024.

### **Due diligence assessment**

Through supervised workshops with an external consultancy agency in May 2023 and January 2024, Komplet Group and its subsidiaries conducted their annual due diligence based on the ISO Standard 31000 methodology for risk management. The aim was to identify, prioritise, and mitigate risks related to the company's ability to safeguard human rights and decent working conditions (see below). Key people from the group and subsidiaries with insight into the value chain and procurement processes participated (hereafter referred to as the working group).

In the assessment, the working group considered risks associated with its own operations, business partners and supply chains.

Following the due diligence assessment, the working group identified both internal and external risks, established mitigation plans and implemented measures to mitigate potential negative impacts.

#### **Internal risk:**

With regards to the company's supply chain, Komplet Group has yet to initiate screening and supplier assessments, except for private label in NetOnNet. This fact causes a risk of violations of human rights and decent working conditions.

Further, limited resources and lack of system support makes it challenging to carry out proper supplier assessments. A consequence of this is limited insight and knowledge about the supply chain and its potential risks.

Another internal risk is the price pressure on private label which can contribute to higher risk of violation of human rights and decent working conditions.

Furthermore, there is risk related to improvement of routines and agreements with business partners. Business partners should sign the Group's Supplier Code of Conduct, especially to ensure that the business partners within the service and maintenance industry comply with the Transparency Act. For instance, Komplet is aware that workers in transportation and logistics industry have a higher risk of work rights violations as the sector is under high pressure to compete on

flexibility and responsiveness from the companies, which applies pressure to reduce wages and working conditions. Although no incidents were reported in 2023, the management intends to contribute to mitigating the potential risks of human rights abuses and unsatisfactory working conditions by promoting a culture of accountability among its business partners.

As for the company's own workforce, a relevant risk is health and safety for employees in warehouses and stores. However, the risk is considered to be low due to strict regulations for health and safety in the workplace as well as workers' rights in general.

#### **External risk**

The most significant external risk identified by Komplet Group and its subsidiaries is the use of minerals in, for example, mobile phones and computers. Activities include the extraction, transportation, handling, trading, processing, smelting, refining, and alloying of raw materials.

These minerals are defined by the OECD as high-risk raw materials if they originate from conflict-affected and high-risk areas identified by the presence of armed conflict, widespread violence, or other risks of harm to people. As these minerals are part of tier 1 suppliers' supply chains, Komplet Group has limited insight to and impact on the sourcing of these minerals. However, due to its seriousness, the group has identified it as a risk area to keep an eye on in going forward.

The production of other electronic components, such as electronic parts, metals, and

plastics, also carries a high risk of labour and human rights violations. The Komplet Group and its suppliers, particularly in China, face concerns about forced labour and child labour. Mining and mineral sourcing, particularly for lithium and microchip materials, pose risks to workers, including harsh conditions, noise, and long working hours.

Another key challenge in relation to the company's supply chains is their highly complex character. With over 1000 suppliers worldwide, supplier audits require extensive screenings and analysis, which the company has not yet implemented. This increases the risk of overlooking human rights and decent work violations in both production and distribution.

Regarding the company's own brands (private label), Komplet Group's experience in China is that its suppliers have limited transparency, assessment, or control beyond tier 1 suppliers. As a result, there is a risk of human rights abuses and poor working conditions in the production of the company's own private label.

There are also risks related to shipping from China. The transport sector is considered particularly vulnerable in terms of decent working conditions, and we continuously keep an eye on risks related to violations.

For more information about findings in the subsidiaries' due diligence assessments, please see the appendix.

## MITIGATION OF RISK

Based on the risk assessment for 2023, Komplet Group has identified the following measures to manage and mitigate potential negative impacts:

### 1. Develop the responsibility and routines regarding supplier assessments

- ▶ The private label business, including inspections and supplier follow-up, was handled by NetOnNet in 2023. Going forward, this work will continue as a part of the centralised procurement process within Komplet Group.
- ▶ Continue with supplier assessments for new suppliers, as well as monitoring risks related to existing suppliers. The need for a more efficient system support will continuously be assessed. During 2024, Komplet Group will strengthen its supplier audits by modifying, improve and implement the supplier follow-up and onboarding process for new suppliers. Implementing a similar process in the subsidiaries is also being considered.
- ▶ Continuously assess the need for resources and more in-depth expertise.
- ▶ Plan and conduct on-site supplier audits every two years, prioritising suppliers with a high risk of having a negative impact on labour rights, human rights, and working conditions.

### 2. Develop routines and procedures for due diligence assessments of business partners

- ▶ Komplet Group will mitigate potential non-compliance with its business partners in the transport and logistics industry through developing the procedures related to the duty to ensure compliance in line with the Norwegian Labour Inspection Authorities (Påseplikten). By including contract clauses stating that the supplier's employees shall receive a minimum pay and operate in safe working conditions in accordance with the General Application Regulations, and by obtaining documentation of the employees' wages and daily subsistence allowance, Komplet will meet this requirement.
- ▶ Komplet Group will ensure that all service suppliers and other business partners sign the Supplier Code of Conduct.

### 3. Increase employees' knowledge and awareness on purchase request within the operation

- ▶ With the help of Learnifier, an annual Supplier Code of Conduct training for all purchasers in the organisation is proposed to be established. The training is to be completed and signed off by the employees on completion of the programme.
- ▶ Employees who purchase services on behalf of the company must be familiar with the supplier assessments carried out by the procurement department to ensure compliance with the Transparency Act. They are required to replicate these assessments before deciding on new services. In addition, it is essential to establish a routine for business partners to sign the Supplier Code of Conduct.

- ▶ Ensuring safe e-waste disposal practices is essential to protect the health of workers involved in e-waste recycling.

**4. Carry out risk assessment of the use of conflict minerals in products provided to engage in more responsible mineral sourcing**

- ▶ As recommended by the EU Conflict Minerals Regulation, Komplet Group will assess the risk of sourcing raw materials from a fragile and conflict-affected region and the likelihood that these raw materials could fund conflict, forced labour or other risks in order to engage in more responsible mineral sourcing practices.

**5. Risk mapping of countries and products**

- ▶ Komplet Group will continue to conduct the risk-based supply chain mapping throughout all subsidiaries, to gain more knowledge of its supply chain.

**6. Monitoring measures**

- ▶ Komplet Group will monitor its actions to assess the impacts of the above initiatives and continually improve its practices.

**EXPECTED EFFECTS OF THE MEASURES**

The centralisation of responsibilities in procurement is expected to strengthen supplier assessments and audits, ensuring better alignment with ethical standards.

The reinforcement of supplier audits, both for new and existing suppliers, aims to strengthen risk management throughout the supply chain.

The establishment of due diligence assessments and the requirement for all business partners to sign the Supplier Code of Conduct will ensure that the group has business partners with the same business ethics and values.

The initiatives to increase employee competency and awareness, from local skills development to annual Supplier Code of Conduct training, are expected to contribute to a culture of responsible sourcing.

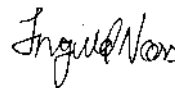
Ongoing supply chain mapping ensures that Komplet Group takes a proactive approach towards responsible sourcing.

Altogether, these measures represent a way to enhance ethical, responsible, and transparent business practices, aligning Komplet Group with its commitment to sustainable and socially responsible operations.

Sandefjord, 19 March 2024  
Board of directors and CEO, Komplet ASA



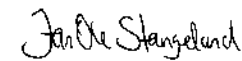
**Jo Olav Lunder**  
Chair



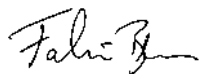
**Ingvild Næss**  
Director



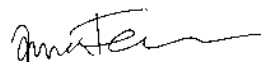
**Susanne Ehnbage**  
Director



**Jan Ole Stangeland**  
Director



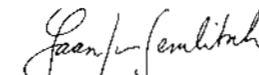
**Fabian Bengtsson**  
Director



**Anna Fernmo**  
Worker director



**Anders Odden**  
Worker director



**Jaan Ivar Semlitsch**  
CEO



## KOMPLETT SERVICES AS & KOMPLETT DISTRIBUTION AS – TRANSPARENCY ACT ACCOUNT

This account has been prepared in accordance with the Transparency Act and covers activities in Komplet Services AS and Komplet Distribution AS (“Komplet”). It summarises governance, policies, and procedures regarding the protection of human rights and decent working conditions, as well as risk identified in the due diligence assessment and measures to mitigate these risks.

### ABOUT KOMPLETT

Komplet provides consumer electronics on the platforms Komplet.no, Komplet.se and Komplet.dk. Komplet also operates two pick-up points, one in Oslo and one at the warehouse in Sandefjord. Komplet delivers to the B2B market in Norway and Sweden through Komplet-bedrift.no and Kompletforetag.se. The head office is located in Sandefjord, Norway.

Through the brand Itegra, Komplet holds the group’s activities in the distribution segment and consist of large-scale distribution contracts for sale to resellers and other big entities not covered by B2B. Itegra is present in Norway and Sweden and serves its customers through the websites Itegra.no and Itegra.se.

Komplet sells mainly products from large and established brands. Throughout 2023, Komplet collaborated with approximately 200 tier 1 suppliers. Komplet also offered private label products under the brand names Svive, liglo, Intono, Khameleon, Komplet PC, 3241 and Pro tech tools. The company’s procurement partners for its private label products are F&H Group, CBK and Calisto.

Going forward we will collaborate within Komplet Group on the sourcing of private labels.

### Commitments to human rights and decent working conditions

Komplet complies with the Komplet Group commitments. For more information, please see the Komplet Group Account.

### GOVERNANCE OF HUMAN RIGHTS AND DECENT WORKING CONDITIONS

#### Responsibilities

The board of directors of Komplet Group has been informed of the Transparency Act and the duties connected to the law. The group CEO is responsible for the group and the subsidiaries complying with the duties set out in the act.

Komplet’s compliance and quality director, quality manager and the category department have the responsibility for conducting due diligence on human rights and decent working conditions in line with the act and the OECD guidelines.

For more information on responsibilities, please see the Komplet Group Account.

#### Policies and governing documents

Komplet expects its suppliers to share the values and requirements regarding responsible business conduct. The Supplier Code of Conduct is signed by the suppliers as part of the agreement. In 2023, no major breaches of the Supplier Code of Conduct were reported.

In 2024, Komplet Services AS and Komplet Distribution AS will work to adopt Komplet Group’s updated Supplier Code of Conduct to align its policies with UN Global Compact principles and OECD Guidelines, as well as other internationally recognised initiatives, such as the UN Guiding Principles on Business and Human Rights.

For more information on policies and governing documents, please see the Komplet Group Account.

#### Whistleblowing

Komplet has a channel for whistleblowing in place. For more information, please see the Komplet Group Account.

### DUE DILIGENCE WITH RESPECT TO HUMAN RIGHTS AND DECENT WORKING CONDITIONS

#### Due diligence assessment

Through a supervised workshop in January 2024, Komplet conducted a strategic due diligence assessment in accordance with the requirements of the Transparency Act. The assessment was based on a methodology including ISO Standard 31000 for risk management, with the aim to identify and prioritise risk related to Komplet’s ability to promote and protect human rights and decent working conditions.

In the assessment, Komplet looked at risks associated with its own operations, business partners and supply chains. Key employees with insight into the value chain and procurement processes participated. Both internal and external risks were covered.

Komplett Services and Komplett Distribusjon also started mapping the risks associated with all their suppliers and business partners in August 2023. All tier 1 suppliers and business partners are mapped, and risk level has been set based on geography, product type and raw materials. The work will continue in 2024.

**Internal risk:**

Komplett has identified a need for additional expertise and resources to strengthen the work related to supplier assessments. Further, system support is needed for the company to be able to carry out assessments of the supply chains in an effective way and to provide documentation to stakeholders regarding information requests.

Further, Komplett does not have a risk profile of products and commodities which makes it challenging to prioritise suppliers and areas in need of screening and assessments.

**External risk:**

Komplett has identified minerals from conflict-affected and high-risk areas as a matter of severe risk. For more information about this, please see the Komplett Group Account.

Further, protection of human rights and decent working conditions in production, as well as chemical use in this part of the supply chains is seen as areas of high risk. The risk is increasing as the supply chain is complex and has a low degree of transparency. There is also a lack of competence in the supply chain on these matters.

Lastly, Komplett has identified human rights and decent working conditions in distribution as an area of risk, especially outside of Scandinavia.

**MITIGATION OF RISK  
Measures**

Based on the strategic due diligence assessment, Komplett has not identified actual negative impacts on fundamental human rights and decent working conditions linked to the company's own operations, the supply chains and business partners.

Gaining a better insight into the supply chains is an important measure in 2024. There has been a project to further monitor sourcing partners through audits for compliance with the standards and requirements set out in the company's Supplier Code of Conduct.

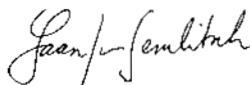
For the potential negative impacts identified in the strategic due diligence assessment, the following measures and initiatives have been identified:

- ▶ Establish a plan for supplier screening and assessments.
- ▶ Self-assessment surveys of new and existing suppliers.
- ▶ Continue to improve risk mapping of countries, products, and raw materials.
- ▶ Assess the need for resources and competence.
  - Establish a plan for competence development and to develop an annual training programme through Learnifyer.
- ▶ Collaborate with Komplett Group regarding sourcing of private label.

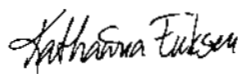
The implementation of the above-mentioned measures will start in 2024 and provide Komplett with a better overview of all risks related to human rights and decent working conditions. Further, measures will contribute to monitor potential risk and adverse impact that might occur.

Sandefjord, 19 March 2024

Board of directors and managing director, Komplett Services AS & Komplett Distribusjon AS



Jaan Ivar Semlitsch  
Chair



Katharina Eriksen  
Director



Thomas Røkke  
Director



Erlend Stefansson  
Managing director  
Komplett Services



Jan Erik Svendsen  
Managing director  
Komplett Distribusjon AS

## NETONNET AB – TRANSPARENCY ACT ACCOUNT

This account has been prepared in accordance with the Transparency Act and covers activities in NetOnNet AB (“NetOnNet”). It summarises governance, policies, and procedures regarding the protection of human rights and decent working conditions, as well as risks identified in the due diligence assessment and measures to mitigate these risks.

### ABOUT NETONNET

NetOnNet has two online shops in Sweden and Norway, NetOnNet.se and NetOnNet.no, and a total of 31 complementary self-service, logistics and warehouse shops located in Sweden and Norway. Since 2022, NetOnNet has been part of Komplet Group. The head office is located in Borås, Sweden.

NetOnNet mainly sells products from large and established brands. But the company also offers private label products under the brand names Andersson, Freev, Austin & BBQ, ON, Skantic, Mission SG, Loeffen, Pure Sense and Svive. In 2023, NetOnNet had 196 contracted private label suppliers, by which 130 active collaborations. Furthermore, the company introduced 206 new products under its private labels.

### The operation in Guangdong, China

The group’s private labels are sourced through the company’s procurement office in Guangdong/Dongguan, China. This office consists of 23 employees, and the company recognises its responsibility to ensure that the office complies with the requirements of the Transparency Act.

In 2023, NetOnNet assessed its ability to ensure that the procurement office comply with the six steps of the OECD Guidelines, as required by the Act:

#### (1) Embed responsible business practices into policies and management systems:

The procurement office in Guangdong is comprised by the group’s Code of Conduct, an internal policy regulating human rights and decent working conditions for all employees in line with international standards. Furthermore, the office has implemented the group’s updated Supplier Code of Conduct to ensure that the same standards are expected and met by suppliers connected to the private labels. NetOnNet assesses and monitors suppliers’ compliance by using a checklist during supplier audits. It is also worth noting that employees working with suppliers in the company are provided with both training materials and training programs delivered by accredited institutions such as TUV and SGS.

#### (2) Identify and assess actual and potential adverse impacts:

NetOnNet uses its whistleblower channel and data analysis tool, Winningtemp, to systematically map the risk of non-compliance in its own operations, both in Scandinavia and in the procurement office in China. In terms of the supply chain, the company maps and categorises suppliers at risk of non-compliance by conducting frequent supplier audits throughout the year. Contact points are also established between private label

suppliers and NetOnNet’s supplier quality engineer (SQE) and procurement to facilitate access to information on human rights and working conditions.

#### (3) Cease, prevent, and mitigate adverse impacts:

NetOnNet takes concrete measures to prevent and reduce the risk of human rights violations in its own operations and in the supply chain through internal communication mechanisms and the above-mentioned supplier audits. If a supplier fails to meet the company’s requirements, the company will terminate its relationship with the supplier.

**(4) Track implementation and results:** The company monitors its results through the above-mentioned whistleblowing channel and assesses whether they have achieved their goal of safeguarding human rights in the following areas: The right to an adequate standard of living, the right to adequate food, the right to life, the right to health, gender equality, the right to work, the right to just and favourable conditions for work, and the right to access to information. NetOnNet reports to the board on its human rights work connected in its own operations in Scandinavia and in China in the annual sustainability report.

#### (5) Communicate how impacts are addressed:

NetOnNet communicates to its affected stakeholders how it is addressing its negative impacts. Stakeholder dialogue is established through a variety of formal

and informal channels, including tools, interviews, emails, and text messages.

**(6) Provide for or cooperate in remediation when appropriate:** Internal procedures for addressing human rights violations in terms of remediation and compensation are established at group level. Remediation and compensation are initiated when the offending party is the organisation itself. Although the procedures consider the Chinese Labour Law if such incidents occur, NetOnNet recognises that more can be done to strengthen these procedures in the future.

### Commitments to human rights and decent working conditions

NetOnNet complies with the group commitments. For more information, please see the Komplet Group Account.

### GOVERNANCE OF HUMAN RIGHTS AND DECENT WORKING CONDITIONS Responsibilities

The board of directors has been informed of the Transparency Act and the duties related to the law. The group CEO is responsible for the group and the subsidiaries complying with the duties as set out in the act.

NetOnNet's head of communications & sustainability is responsible for the work related to sustainability at NetOnNet. This includes an overall responsibility for social matters, including human and labour rights. The category department has a particular responsibility for screening and assessment on human and labour rights of private label.

The distribution of responsibility for conducting due diligence on human rights and decent working conditions in line with the act and the OECD guidelines is in progress.

For more information on responsibilities, please see the Komplet Group Account.

### Policies and governing documents

NetOnNet's Supplier Code of Conduct is based on the UN Universal Declaration of Human Rights, the ILO's (International Labour Organisation) eight fundamental human rights conventions on working life, the Convention on the Rights of the Child, UN Global Compact, and the OECD Guidelines for the Operations of Multinational Enterprises.

All NetOnNet's suppliers of private label have signed NetOnNet's Supplier Code of Conduct. Further, all subcontractors are to comply with the requirements. If the supplier has their own Code of Conduct, they must comply with at least the same level and provide NetOnNet with information about its subcontractors upon request.

In 2024, NetOnNet will work to adopt Komplet Group's updated Supplier Code of Conduct which is aligned with UN Global Compact principles and OECD Guidelines, as well as other internationally recognised initiatives, such as the UN Guiding Principles on Business and Human Rights.

For more information on policies and governing documents on group level, please see the Komplet Group Account.

### Whistleblowing

NetOnNet has a channel for whistleblowing in place. For more information, please see the Komplet Group Account.

### DUE DILIGENCE WITH RESPECT TO HUMAN RIGHTS AND DECENT WORKING CONDITIONS

NetOnNet purchases products directly from global consumer electronics manufacturers and distributors. Asia dominates the production of consumer electronics, with China being by far the dominant manufacturing country.

NetOnNet has commercial agreements with all its 196 private label suppliers in China, where the Supplier Code of Conduct is a key component. Private label suppliers are not allowed to use subcontractors that are not approved by NetOnNet. Compliance is ensured through ongoing physical inspections as part of its factory audits. NetOnNet's inspection protocol is based on the standards from ISO 9001 and the CSR audit based in BSCI Code of Conduct. This includes questions on human and labour rights.

The aim is to inspect each factory at least every two years. In 2023, a total of 67 audits were carried out on various factories. Following a standardised procedure encompassing around 240 inquiries related to quality, CSR, and environmental practices. Conducted by members of the local team in Guangdong comprising 23 members, the audits employ a point system for grading (A, B, or C), with non-compliant factories given opportunities for improvement, serving as valuable learning experiences.

Outcomes indicated that seven audited factories failed to meet the organisation's standards, leading to the termination of collaborations with these

entities. This process also involved a case where labour rights were not up to the required standard. NetOnNet will continue this work in 2024.

**Due diligence assessment**

Through a supervised workshop in January 2024, NetOnNet conducted a strategic due diligence assessment in accordance with the requirements of the Transparency Act. The assessment was based on a methodology including ISO Standard 31000 for risk management, with the aim to identify and prioritise risk related to NetOnNet’s ability to promote and protect human rights and decent working conditions.

In the assessment, NetOnNet looked at risks associated with its own operations, business partners and supply chains. Key employees with insight into the value chain and procurement processes participated and both internal and external risk were covered.

NetOnNet also started mapping the risks associated with all its suppliers and business partners in August 2023. All tier 1 suppliers and business partners are mapped, and risk level has been set based on geography, product type and raw materials. The work will continue in 2024.

**Internal risk:**

NetOnNet has identified a future need for additional expertise and resources to strengthen the work on due diligence and supplier assess-

ments going forward. Further, system support is needed for the company to be able to carry out due diligence and assessments of suppliers in line with the OECD guidelines in the future.

NetOnNet does not conduct screening or assessments of brand suppliers and has no insight or control beyond tier 1 suppliers of private labels. The brand suppliers do, however, sign the Supplier Code of Conduct. As for business partners and distributions partners, the Supplier Code of Conduct has not been signed.

**External risk:**

NetOnNet has identified minerals from conflict-affected and high-risk areas as a matter of severe risk. For more information on this, please see the Komplett Group Account. Working conditions at subcontractors to tier 1 suppliers of private label is also considered an area of severe risk as most of the production is done in China. There is also uncertainty about if and how tier 1 suppliers screen and assess the subcontractors. As for brand suppliers, there is a low degree of transparency in how they work to protect human rights and decent working conditions.

**MITIGATION OF RISK**

**Measures**

Based on the strategic due diligence assessment and other conducted screenings, NetOnNet has not identified actual negative impacts on fundamental human rights and decent work-

ing conditions linked to its own operations, the supply chains and business partners.

Going forward, NetOnNet aims, in addition to audits, to provide suppliers that did not meet the requirements when audited, with guidance in order to helping them reach the highly set quality standards. In addition to the factory audits, the company will also introduce self assessments for tier 2 suppliers. For the potential negative impacts identified in the strategic due diligence assessment the following measures and initiatives have been identified:

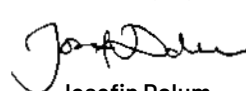
- ▶ Establish system support for self-assessment questioners for tier 1 suppliers.
- ▶ Increase knowledge and carry out risk assessment of the use of conflict minerals in products provided.
- ▶ Increase knowledge and start to carry out due diligence assessment of subcontractors of private label.
- ▶ Map the need for internal system support and resources.
- ▶ Establish a plan for competence development.

Implementation of measures will start in 2024 and provide NetOnNet with better transparency related to human rights and decent working conditions. Further, measures will contribute to monitor potential risk and adverse impact that might occur.

Sandefjord, 19 March 2024

Board of directors and managing director, NetOnNet AB

  
Jaan Ivar Semlitsch  
Chair

  
Josefin Dalum  
Managing director

  
Thomas Røkke  
Director

## WEBHALLEN AB – TRANSPARENCY ACT ACCOUNT

This account has been prepared in accordance with the Transparency Act and covers activities in Webhallen AB (“Webhallen”). It summarises governance, policies, and procedures regarding the protection of human rights and decent working conditions, as well as risk identified in the due diligence assessment and measure to mitigate these risks.

### ABOUT WEBHALLEN

Webhallen is one of Sweden’s leading retailers in hardware, home electronics, gadgets, games, and film. The company is an omnichannel provider with the online platform Webhallen.com and in 2023 there were 17 retail stores and pick-up points, located strategically around Stockholm and bigger cities in Sweden. The company was acquired by Komplet Group in 2013 and has the head office in Stockholm, Sweden.

Webhallen mainly sells products from large and established brands. Throughout 2023, Webhallen collaborated with 203 suppliers. Webhallen does not have its own private labels, but source private labels from NetOnNet and Komplet.

### Commitments to human rights and decent working conditions

Webhallen complies with the group commitments. For more information, please see the Komplet Group Account.

### GOVERNANCE OF HUMAN RIGHTS AND DECENT WORKING CONDITIONS

#### Responsibilities

The board of directors has been informed of the Transparency Act and the duties connected to the law. The CEO of the group is responsible for the group and the subsidiaries complying with the duties as set out in the act.

Webhallen’s procurement department has the responsibility for conducting due diligence on human rights and decent working conditions in line with the act and the OECD guidelines.

For more information on responsibilities at group level, please see the Komplet Group Account.

#### Policies and governing documents

Webhallen’s Code of Conduct for employees describes its commitment to maintaining high ethical standards in everything the company does. It sets out the standards of behaviour that Webhallen can expect from internal parties, and what external parties can expect from Webhallen. In 2023, Webhallen did not have a Code of Conduct for suppliers.

For more information on group policies and governing documents, please see the Komplet Group Account.

#### Whistleblowing

Webhallen has a channel for whistleblowing in place. For more information, please see the Komplet Group Account.

### DUE DILIGENCE WITH RESPECT TO HUMAN RIGHTS AND DECENT WORKING CONDITIONS

#### Due diligence assessment

Through a supervised workshop in January 2024, Webhallen conducted a strategic due diligence assessment in accordance with the requirements of the Transparency Act. The assessment was based on a methodology including ISO Standard 31000 for risk management, with the aim to identify and prioritise risk related to Webhallen’s ability to promote and protect human rights and decent working conditions.

In the assessment, Webhallen looked at risks associated with its own operations, business partners and supply chains. Key employees with insight into the value chain and procurement processes participated and both internal and external risks were covered.

Webhallen also started mapping the risks associated with all its suppliers and business partners in August 2023. All tier 1 suppliers and business partners are mapped, and risk level has been set based on geography, product type and raw materials. The work will continue in 2024.

#### Internal risk:

Webhallen does not conduct due diligence or supplier screening/assessments on human rights and decent working conditions on either new or existing suppliers. The company has identified a need for additional expertise and resources to strengthen the work on due diligence and supplier assessments. Further, sys-

tem support is needed for Webhallen to be able to carry out assessments of the supply chains accordingly.

A consequence is that Webhallen has limited insight and knowledge about potential risk that might occur in the supply chains. As for the company's own operations, Webhallen has identified health and safety for employees in warehouses and stores as an area of risk. However, the risk is considered to be low due to strict regulations on health and safety and employee rights.

**External risk:**

Webhallen has identified minerals from conflict-affected and high-risk areas as a severe risk. For more information about this, please

see the Komplet Group Account. The same goes for working conditions in the production part of the supply chains. The supply chains are of high complexity which may increase the risk of violation of human rights and decent working conditions. Further, working conditions in distribution are also considered an area of risk.

**MITIGATION OF RISK**

**Measures**

Based on the strategic due diligence assessment, Webhallen has not identified actual negative impacts on fundamental human rights and decent working conditions linked to its own operations, the supply chains and business partners. For the potential negative impacts identified in the due diligence assess-

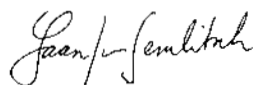
ment the following measures and initiatives have been identified:

- ▶ Develop routines, checklists and other governing documents for due diligence and screening/assessments of suppliers.
- ▶ Assess the need of resources.
- ▶ Establish a plan for competence development.
- ▶ Risk mapping of countries, products, and raw materials.

Implementation of measures will start in 2024 and enable Webhallen to implement guidelines and procedures for conducting due diligence and supplier assessments. Further, the measures will contribute to monitoring potential risk and adverse impact that might occur.

Sandefjord, 19 March 2024

Board of directors and managing director, Webhallen AB



**Jaan Ivar Semlitsch**  
Chair



**Katharina Eriksen**  
Director



**Thomas Røkke**  
Director



**Trygve Hillesland**  
Managing director

## IRONSTONE AS – TRANSPARENCY ACT ACCOUNT

This account has been prepared in accordance with the Transparency Act and covers activities in Ironstone AS (“Ironstone”). It summarises governance, policies, and procedures regarding the protection of human rights and decent working conditions, as well as risks identified in the due diligence assessment and measure to mitigate these risks.

### ABOUT IRONSTONE AS

Ironstone is a 100 per cent cloud company helping businesses with IT solutions ranging from software to customer service. Ironstone aims to be a business partner rather than a traditional IT partner and delivers hardware through Komplet as part of their service. Ironstone was acquired by Komplet Group in 2021. The head office is located in Oslo, Norway.

### Commitments to human rights and decent working conditions

Ironstone complies with the group commitments. For more information, please see the Komplet Group Account.

### GOVERNANCE OF HUMAN RIGHTS AND DECENT WORKING CONDITIONS

#### Responsibilities

The board of directors has been informed of the Transparency Act and the duties connected to the law. The CEO of the group is responsible for the group and the subsidiaries complying with the duties as set out in the act.

In Ironstone, the CEO is responsible for the company conducting due diligence on human

rights and decent working conditions in line with the act and the OECD guidelines.

For more information on group responsibilities, please see the Komplet Group Account.

### Policies and governing documents

In 2023, Ironstone did not have an internal or Supplier Code of Conduct. For more information on group policies and governing documents, please see the Komplet Group Account.

### Whistleblowing

Ironstone has procedures for whistleblowing in place. For more information, please see the Komplet Group Account.

### DUE DILIGENCE WITH RESPECT TO HUMAN RIGHTS AND DECENT WORKING CONDITIONS

#### Due diligence assessment

Through a supervised workshop in January 2024, Ironstone conducted a strategic due diligence assessment in accordance with the requirements of the Transparency Act. The assessment was based on a methodology including ISO Standard 31000 for risk management, with the aim to identify and prioritise risk related to Ironstone’s ability to promote and protect human rights and decent working conditions.

In the assessment, Ironstone looked at risks associated with its own operations, business partners and supply chains. Key employees with insight into the value chain and procurement processes participated and both internal and external risk was covered.

Ironstone also started mapping the risks associated with all its suppliers and business partners in August 2023. All tier 1 suppliers and business partners are mapped, and risk level has been set based on geography, product type and raw materials. The work will continue in 2024.

#### Internal risk:

Ironstone has identified limited resources and competence to conduct in-depth screening of suppliers as a risk for the company’s ability to promote human rights and decent working conditions.

#### External risk:

As part of the service, Ironstone, may deliver hardware to customers, supplied by Komplet. Some of these hardware products are risk exposed as they contain minerals where it is considered to be a high risk of violation of human rights and working conditions. For more information about minerals from conflict-affected and high-risk areas, please see the Komplet Group Account.

Further, Ironstone has identified materials used in data centres as an area that might involve risk.

### MITIGATION OF RISK

#### Measures

Based on the strategic due diligence assessment, Ironstone has not identified actual negative impacts on fundamental human rights and decent working conditions linked to its own operations, the supply chains and business



partners. For the potential negative impacts identified in the due diligence assessment the following measures and initiatives have been identified:

- ▶ Develop routines, checklists and other governing documents for due diligence and assessments of suppliers.
- ▶ Establish systems and routines for assessment of tier 1 suppliers through self-assessment /questionnaires.
- ▶ Assess the need for resources and competence.

- ▶ Risk prioritisation of existing suppliers
- ▶ Map the conditions in the service parks of business partners.

Implementation of measures will start in 2024 and enable Ironstone to implement guidelines and procedures for conducting due diligence and supplier assessments. Further, the measures will contribute to monitor potential risk and adverse impact that might occur.

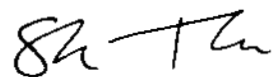
Sandefjord, 19 March 2024  
Board of directors and managing director, Ironstone AS



**Erlend Stefanson**  
Chair



**Stig Nerland**  
Director



**Stefan Thoren**  
Director



**Alexander Bergedalen**  
Managing director

## Komplett ASA

**Visitor address:**

Østre Kullerød 4  
NO-3241 Sandefjord  
Norway

**Postal address:**

P.O. Box 2094  
NO-3202 Sandefjord  
Norway

**T:** +47 33 00 50 00  
**E:** [ir@komplett.com](mailto:ir@komplett.com)

[www.komplettgroup.com](http://www.komplettgroup.com)