



Sustainability Report

2024

Hallgruppen AS



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About this report

This sustainability report marks our very first official reporting of Hallgruppen AS's environmental, social and governance (ESG) efforts for the reporting year 2024.

The report has been prepared in accordance with the Global Reporting Initiative (GRI standard) and, in line with the potential transition to CSRD reporting in 2025, the materiality analysis is based on the principles of double materiality. This involves an assessment of how sustainability impacts our business and how our business impacts people and the environment.

We follow the GHG Protocol for reporting greenhouse gas emissions, which ensures a structured and transparent approach to collecting, measuring and reducing our carbon footprint. Our climate accounting covers all locations within our Group structure that fall within the thresholds for climate accounting.

Furthermore, the report addresses our commitments to safeguarding fundamental human rights and decent working conditions in our value chain.

The report covers Hallgruppen AS and all affiliated subsidiaries (Appendix 1). The report has been reviewed and approved by our CEO and reflects our commitment to responsible and sustainable business operations.

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Message from the CEO

As CEO of Hallgruppen AS, I am proud to present the Group's sustainability report for 2024.

A changing world calls for action

The global view is characterized by increasing sustainability requirements, geopolitical tensions and an ever-faster green transition. This creates both challenges and opportunities for the business community. Companies must adapt to new expectations regarding responsible operations, emission reductions and the circular economy.

It is exciting to lead a business that combines innovation, quality and sustainability in our solutions. Our goal is to strengthen our market position by offering products of high quality, long durability and resilience to climate change. Through targeted product development, we ensure solutions that not only meet today's needs, but are also adapted to future requirements.

Ethical foundation – our responsibility as a partner

We take our responsibility as a reliable and responsible partner seriously. Our business is based on the principles of ethical business conduct, sustainability and quality, in line with, among other things, the OECD's model for responsible business conduct and the UN Global Compact principles. This implies a clear commitment to human rights, environmental responsibility and anti-corruption measures, which form the foundation of our business practices.

Standards that create value

With our presence in both local and international markets, it is crucial for us to maintain the highest standards of product quality, safety and ethical responsibility. Our strict guidelines and continuous improvements ensure that we

deliver solutions that create value for our customers and the community around us.

2024 – a year of significant steps forward

2024 was an important year for the Hallgruppen, in which we took major steps forward. We have invested in expertise and resources by hiring specialists in quality and sustainability at Group level, which lays the foundation for strategic and long-term work going forward.

We build our future on strong values

Through clear goals and practical accountability, we are strengthening the core values that define Hallgruppen: Respect, Community and Honesty. We look forward to continuing our growth and development with a strong focus on quality, sustainability and innovation.

Hallgruppen aims to be a responsible player that creates lasting value – for customers, employees and the society around us.

Lars Dalgaard
CEO





Commitments

Memberships

Hallgruppen participates in the following industry- and environment organisations and promotes industry interests and Sustainable Development Goals:

UN Global Compact

Hallgruppen has been a member of the UN Global Compact (UNGC) since 2022, which is the UN's initiative for sustainable and socially responsible business practices, and the world's largest corporate sustainability initiative. The UN Global Compact is based on ten principles that all companies and organisations are encouraged to follow. By being a member of the UN Global Compact, the company communicates how we contribute and operate in line with these ten principles in the areas of the environment, human rights, labour rights and anti-corruption.

Green Point Norway

Hallgruppen is a member of Green Point Norway. As an importer, we are responsible for the packaging that comes with our products. Membership means that we pay a fee to Green Point Norway to help ensure that packaging waste is handled in an environmentally friendly manner.

Certifications

EcoVadis

Hallgruppen has been assessed for the first time in accordance with EcoVadis, one of the world's most recognised sustainability assessments. Based on criteria within the environment, labor and human rights, business ethics and sustainable procurement. This confirms our commitment to sustainability and continuous improvement.

With a score of 55 out of 100, we have received a Committed Badge from EcoVadis. This represents a 'good' performance

according to EcoVadis. Although we have not yet achieved a medal certification, we see this badge as an important milestone in our sustainability journey. We will use this assessment as a tool for improvement and are actively working on measures to strengthen our efforts going forward. innsats fremover.

EcoVadis Recognition

ISO certification

In 2024, the Group began the process of adapting our management system to future NS-EN ISO 9001 and -14001 certification.

Compliance assessment and commitment to laws and regulations are part of our current management system.

Policies

Code of Conduct

Our Internal Ethical Guidelines (Code of Conduct) and Supplier Code of Conduct are available at hallgruppen.no and provide guidelines for our principles of conduct and business practices, both of which have been approved by the CEO.

Supplier Code of Conduct

Code of Conduct

Whistleblowing

Hallgruppen's whistleblowing procedures are in line with the Group's guidelines. The handling of whistleblowing and concerns is included in Hallgruppen's business ethics principles.

Whistleblowing

Emergency preparedness and crisis management follow common guidelines provided in the management system.



The UN Sustainable Development Goals



Hallgruppen's prioritised sustainable development goals:

8 Decent work and Economic growth

We promote decent work and sustainable growth through internal HSE guidelines, ethical guidelines and our Supplier Code of Conduct. We promote an inclusive working environment with high working standards and transparent reporting channels.

12 Responsible consumption and production

We prioritise suppliers with good product documentation (LCA, EPD) and focus on circular design, reusability and efficient waste management throughout our business and value chain.

13 Climate Action

Our tents support climate adaptation by offering sustainable, relocatable solutions. We report annually on greenhouse gas emissions and are transitioning to activity-based data to gain more accurate Scope 3 insights and emission reductions.

17 Partnerships for the Goals

Good partners are important to us in achieving the SDGs. Our most important suppliers follow our Supplier Code of Conduct, and we are proud members of the UN Global Compact.



Goals we contribute to through our own operations:

- 3 Good health and well-being**
We offer health insurance, gym facilities and occupational health services.
- 5 Gender equality**
We promote diversity and equality in our own operations and towards our suppliers.
- 16 Peace, justice and strong institutions**
We enforce our policies against corruption and train employees in ethical practices.



Goals we contribute to through our activities:

- 2 Zero hunger**
Our mobile storage units (MSUs) store food for emergency relief.
- 9 Industry, innovation and infrastructure**
We offer cost-effective, temporary buildings for hospitals, warehousing and more.



About Hallgruppen

Hallgruppen is one of Europe's leading suppliers for temporary and permanent structures, tents, and buildings.

Since our establishment in 2015, we have grown rapidly with a turnover of around 1,270 million in 2024, 22 offices in 8 countries with headquarters in Norway, and over 160 employees. Our products are delivered to around 80 countries on all continents.

Vision and values

Through our vision 'Cover anything. Anywhere', Hallgruppen aims to achieve global presence with our products through innovative, flexible and sustainable solutions. We will achieve this through our values of respect, community and honesty:

Respect for each other, our customers and our products. A core value of our organisation is embracing differences.

Community fostering a collective mindset where we see solutions not challenges, with a common purpose to achieve high performance levels in an environment where collaboration thrives.

Honesty we take pride in our responsibility to our customers and stakeholders. By consistently delivering on our promises, we foster trust, respect, and dependability.

GRIs: 2-6, 2-7, 2-22



Start-up 2015

Head office in Frogner, Norway



1270 Million

Sales in 2024, NOK



8 Countries

22 Regional Offices



160 Employees

Engineering, production and assembly



Business areas

We develop and deliver both temporary and permanent solutions to public and private sector clients, and also offer tarpaulins, furniture and accessories. With our own engineering department, we ensure tailor-made solutions adapted to the customer's needs and budget, whether for standard products or customized solutions.



Warehousing & logistics



Industry & manufacturing



Emergency relief



Waste & recycling



Construction



Sports



Events



Aviation



Agriculture



Port & Marine



Emergency response

Sustainability KPIs

10%
10% reduction in tCo2e since 2023 (Scope 1)

71%
71% of emissions are based on activity data compared to below 2% in 2023

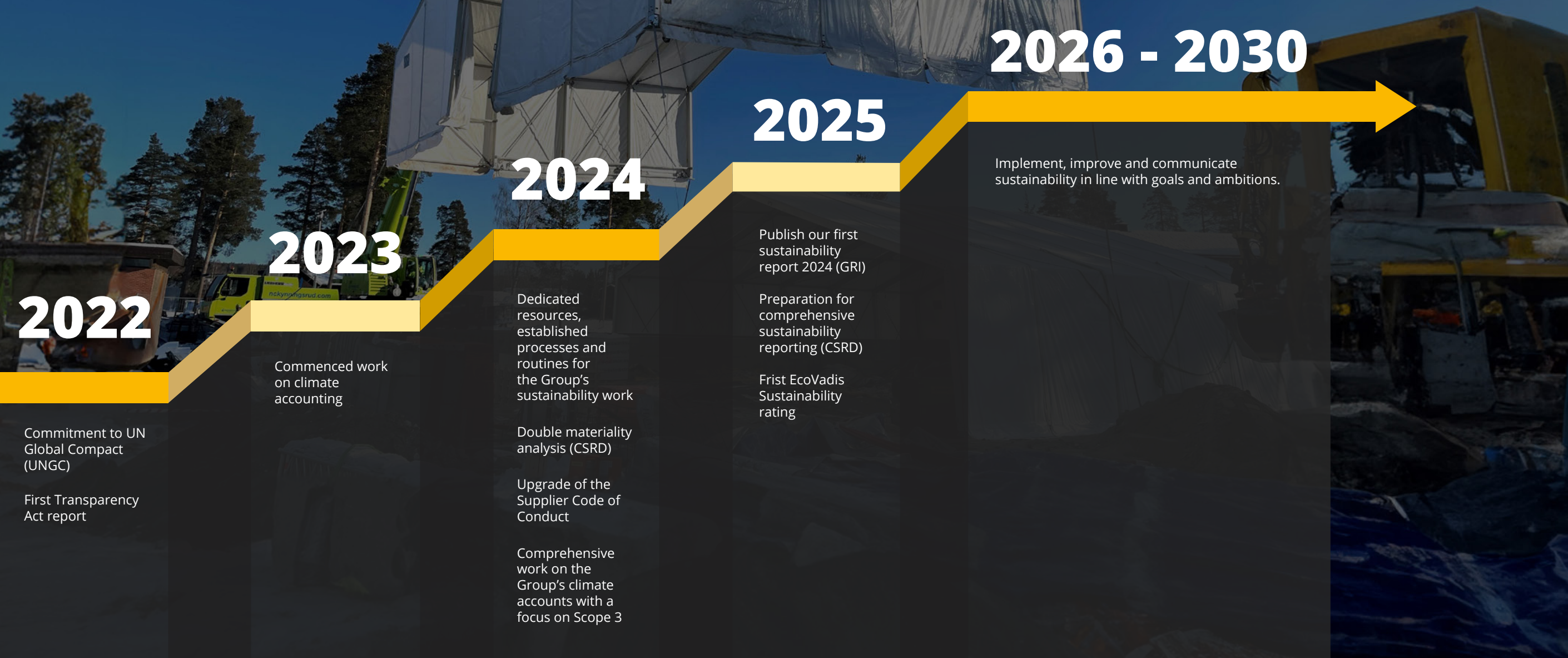
98,4%
98,4% of our Supply chain is covered by risk assessment

83,4%
Waste sorting rate 83,4% for the Group





Sustainability roadmap

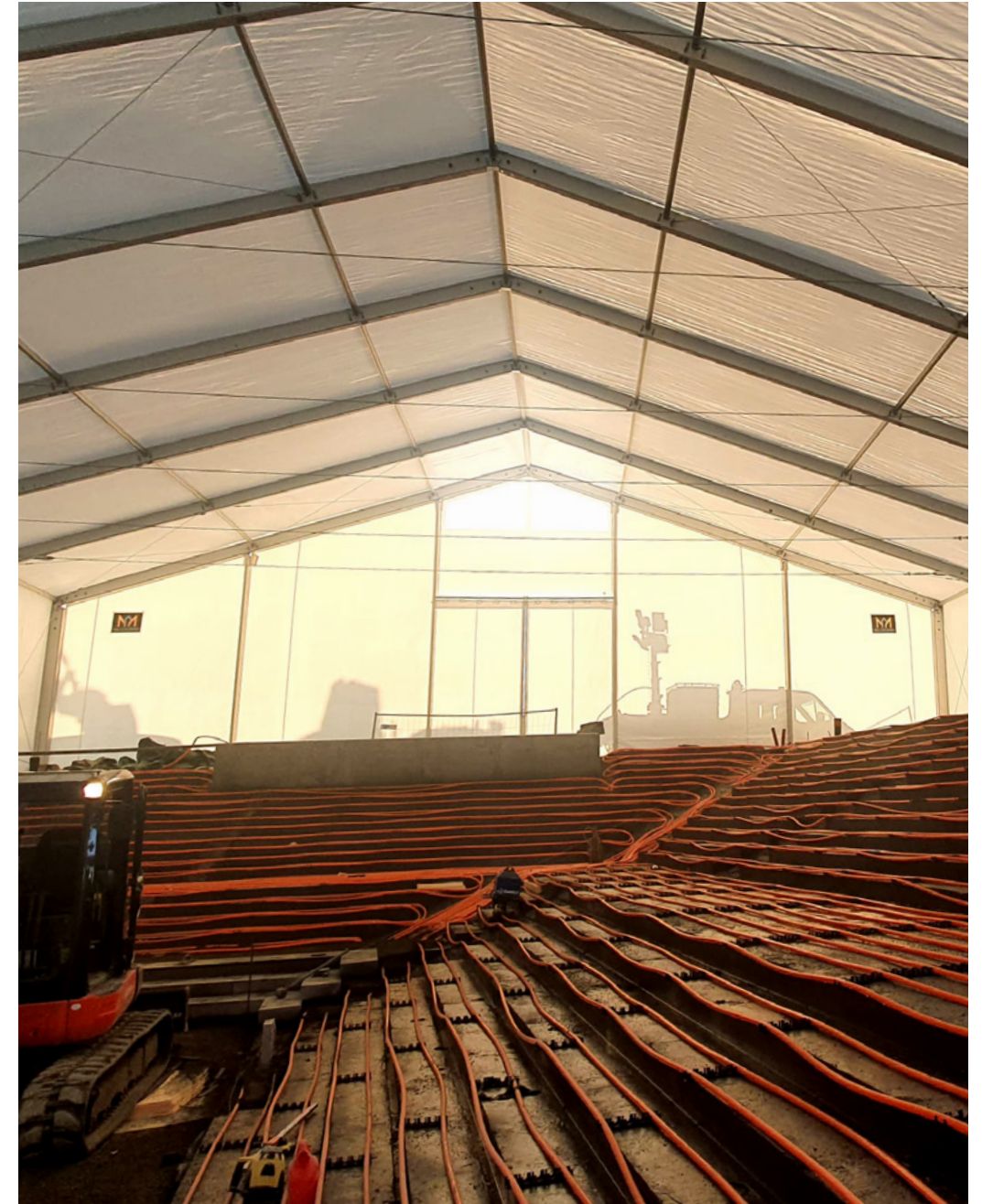


Governance structure and management of material topics

Sustainability is part of Hallgruppen's joint Group functions and monitored by our CEO.

Operational sustainability work, measures, and compliance with Hallgruppen's material topics and reporting are driven by a dedicated Sustainability Manager, who, together with the Head of HSEQ & Sustainability, is responsible for ensuring that sustainability is in line with the overall Group strategy and in compliance with applicable laws and regulations in the areas in which we operate.

Together, they develop, implement and monitor measures to improve our environmental, social and governance performance. This includes strategies for climate and the environment, waste reduction, responsible procurement and compliance with relevant standards and regulations. Through systematic follow-up and evaluation, they ensure that our sustainability practices are in line with our core values and contribute to long-term value creation.



Double materiality analysis

Process for identifying material topics

In 2024, Hallgruppen began work on its first double materiality analysis for the Group, which is important and crucial for identifying and prioritising our key ESG issues (environment, social and governance). These assessments also form the basis for the company’s strategic decisions and direction going forward.

This work was carried out by identifying actual and potential negative and positive impacts within ESG and human rights; upstream, downstream and in our own operations.

The implementation and management of the process was primarily carried out by a central working group consisting of key employees. Based on the Group’s stakeholder mapping, various stakeholder dialogues were conducted to gather information on relevant topics. Each topic was then analysed, assessed and ranked.

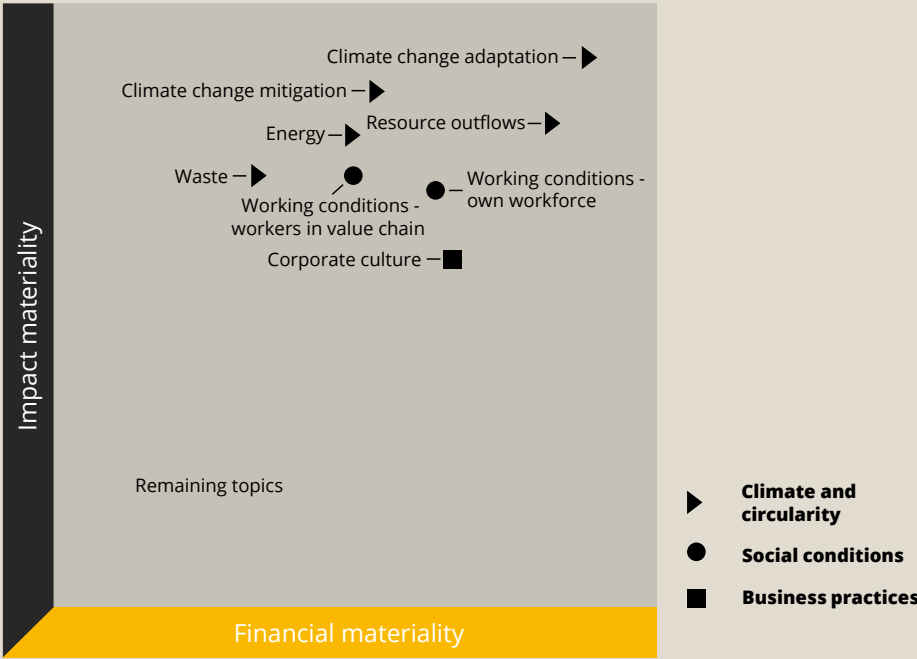
For internal stakeholders, individual meetings were initiated with key internal stakeholders in various fields. For external stakeholders, documentation was reviewed, and information was gathered through ongoing dialogue and meetings with customers, suppliers and industry associations.

See overview of our most important stakeholders and how we manage and engage with them in the table in Appendix 2.

List of material topics

Among the highest priority topics within climate and circularity were climate change adaptation, climate change mitigation, energy, resource outflows and waste. Within social issues, the topics were working conditions in our own operations and for workers in the value chain, and within governance and business practice, the material topic was corporate culture. This demonstrates the broad focus on sustainability among our stakeholders.

Although issues such as gender equality and discrimination, forced and child labour, and anti-corruption were not identified as material, they are in line with the Group’s strategy and relevant to certain stakeholders, and we have therefore chosen to report on them voluntarily in accordance with the GRI.



Climate and circularity

Hallgruppen has an increasing focus on climate and circularity – both in our own operations, in our supply chain and through the products we offer our customers.

Our key sustainability topics within climate, environment and circular economy are integrated into our Group management system and are ensured through policies, guidelines and operating procedures that reflect our commitment to adapt. Responsibility for managing and operationalizing these topics is held by the Group Sustainability Manager. At an operational level, we work to optimize material use, and each business unit monitors sorting rates, material recycling and waste reduction.

Through climate-resistant solutions and responsible use of resources, Hallgruppen is actively participating in the transition to a more sustainable society.



Climate change adaptation

Based on stakeholder dialogue, our knowledge of our core business and supply chain, we see indications that we may be affected and exposed to various forms of risk, particularly related to physical and transition-related factors.

The company's need for materials places a strain on natural resources through extraction and contributes to our climate footprint through production, while transition risk and climate change affect the materials market and may lead to increased costs.

A one-sided focus on financial considerations in supplier management may hinder climate adaptation. A lack of climate adaptation measures may lead to challenges, both in terms of compliance with current and future regulations, as well as ensuring sufficient access to resources.

On the other hand, we have the opportunity to make a positive impact through our climate-resilient solutions.

Hallgruppen's resilient solutions

By focusing on products with lasting durability, flexibility and climate resilience that can withstand future climate challenges, we deliver products that not only meet but exceed technical requirements.

We develop solutions for future scenarios. This includes solutions such as snow lifting tarps, temporary fabric covered structures, weather shelters, structures that can withstand

ground movement, as well as solutions for accommodation and food storage.

Hallgruppen offers products and services that meet the needs of customers in exposed areas, including:

- ✓ **Emergency relief**
- ✓ **Defence sector**
- ✓ **Construction industry**

The structures can often be dismantled and moved, and require less groundwork, which minimizes the environmental impact compared to traditional buildings.





Flexible and weather-resistant solutions

Hallgruppen supplies weather shelter solutions that enable efficient operation all year round, regardless of weather conditions.

Our delivery to the bridge project in Regstrup, Denmark, is one such solution, which was crucial for maintaining progress during the winter months.

The construction shelter, which was 7.5 metres wide and 51 metres long, provided effective protection against wind, rain and snow, ensuring smooth operations while contributing to a safe and secure working environment.

This solution can withstand extreme weather conditions and was further reinforced to meet the safety requirements for nearby train traffic travelling at speeds of up to 120 km/h. Among other things, it withstood tests in wind speeds of up to 32 m/s, which is above hurricane force.

This demonstrates how Hallgruppen's weather shelters combine flexibility and climate resilience, enabling demanding infrastructure projects to be completed without weather-related delays.



[Read more about the project](#)



Sports all year round – with robust, climate-resistant sport halls

Hallgruppen enables sports clubs to use outdoor sports fields all year round – including for children and young adults. With solid, weather-resistant and technically proven structures that are highly durable and require minimal maintenance.

At Hallgruppen, we have developed sports structures that allow sports clubs to make full use of their outdoor areas, even in rain, snow and wind. We have had particular success with this in Denmark with padel sports structures, and the first structure was completed in Hammelev in 2023, with several more projects in the pipeline.

Clear proof of the quality we deliver is the 74-metre-wide football structure we built in Iceland – an area characterized by harsh climatic conditions, prone to earthquakes, strong winds and storms. The sports hall was completed in 2018 and has stood strong ever since, clearly demonstrating Hallgruppen’s focus on safety, quality, technical superiority and durability.

«Hallgruppen’s solutions are designed for fast delivery, easy assembly and the option of relocation, if necessary, which provides unique flexibility across a range of industries» says Lars Dalgaard, CEO of Hallgruppen.

[Read more about the project](#)

[Read more about the project](#)





Hallgruppen moving forward

Our goal is to increase our market share and turnover for products and services to the private sector, organisations and public sector in order to meet the demands arising from climate challenges. At the same time, we want to raise awareness among our customers of the opportunities offered by our solutions within this area.

Hallgruppen will annually assess whether it is appropriate to carry out further climate risk analysis. A climate risk analysis will help to clarify the Group's risk profile in terms of transition risks such as carbon taxes, customs duties, the geopolitical situation and risks related to climate change. This helps us make informed decisions, strengthen our resilience and ensure stable operations in the years ahead. Hallgruppen is committed to complying with EU regulations and local laws, which will also be a strong focus going forward through our transition to ISO 9001 certification.

Strategic supplier management will be crucial in the future when it comes to choosing suppliers with a strong focus on the environment and climate adaptation through material selection and reduction of climate emissions in production. Furthermore, through our work, Hallgruppen can create a positive impact on the entire value chain by actively engaging and influencing key stakeholders, such as suppliers, contractors, engineers and customers.

Climate change mitigation

Climate change is one of the greatest challenges of our time, and according to the UN Climate Panel, global warming is mainly caused by man-made greenhouse gas emissions.

Although our product has a lower impact compared to a permanent building, Hallgruppen's impact through greenhouse gas emissions is mainly related to materials, but also to transport and other activities.

In the future, the choice of suppliers will be a critical factor. In order to strengthen our position as a responsible and preferred player in the market, it will be necessary to allocate resources to systematic environmental monitoring throughout the value chain.

About Hallgruppen's climate accounting
The purpose of Hallgruppen's climate accounting is to provide a comprehensive overview of the Group's climate emissions – both from its own activities and from indirect emissions linked to various stages of the supply chain.

Climate accounting has been prepared in accordance with the method and format of the Greenhouse Gas Protocol (GHG) and is based on an operational control approach. The method distinguishes between:

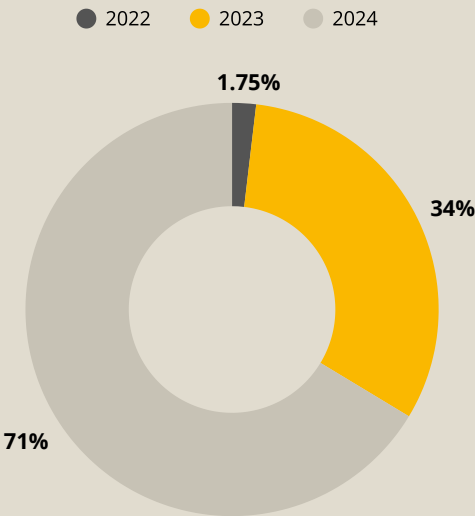
- ✓ **Scope 1 - Direct greenhouse gas emissions**
- ✓ **Scope 2 - Indirect emissions from energy consumption**
- ✓ **Scope 3 - Other indirect emissions**

Hallgruppen has been keeping climate accounting records for its parent company in Norway for several years. For 2024, reporting was expanded to include the Group's fully owned subsidiaries, and the necessary thresholds, processes and procedures were established.

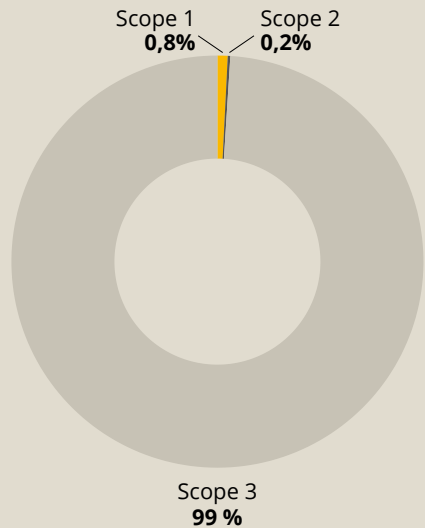
Over the past year, the Group has focused heavily on improving data quality, particularly within Scope 3, through the transition from spend-based to activity-based data. 2024 therefore marks the year with the most accurate and representative data and has been chosen as the Group's 'baseline year'.

In 2024, 71% of total emissions were calculated using activity-based data, compared with 34% in 2023 and only 1.75% in 2022. Overall, this has resulted in a significant increase in reported climate emissions for 2024.

Activity based share of emissions (vs. spend based data)



Emissions breakdown in percentage per Scope



Climate accounting

Scope	Category	2022	2023	2024	Change from last year
Scope 1	Direct ghg emissions	-	-	-	-
	Fuel combustion	175,33	511,98	460,65	-10%
	Internal Combustion vehicles	-	-	-	-
	Other scope1	-	-	-	-
Scope 1 emissions pr year [t CO2e]		175,33	511,98	460,65	-10%
Scope 2	District heating	-	17,81	16,37	-8%
	Electricity consumption (location-based)	12,93	43,80	74,09	69%
	Electricity consumption (market-based)	341,90	454,88	589,75	30%
	Electric vehicles	-	0,87	2,45	181%
Scope 2 emissions pr year [t CO2e] (location-based)		12,93	62,48	92,91	49%
Scope 2 emissions pr year [t CO2e] (market-based)		341,90	473,56	608,56	29%
Scope 3	Purchased goods and services	27 727,20	41 195,34	55 849,45	36%
	Capital goods	74,16	27,20	31,57	16%
	Fuel and energy related activities	-	-	-	-
	Upstream transportation and distribution	1 249,48	1 288,91	2 570,71	99%
	Waste generated in operations	36,19	13,20	13,71	4%
	Business travel	-	109,96	162,92	48%
	Employee commuting	-	-	-	-
	Upstream leased assets	-	-	-	-
	Downstream transportation and distribution	-	-	-	-
	Processing of sold products	-	-	-	-
	Use of sold products	-	-	-	-
	End of life treatment of sold products	-	-	-	-
	Downstream leased assets	-	-	-	-
	Franchises	-	-	-	-
	Investments	-	-	-	-
Scope 3 emissions pr year [t CO2e]		29 087,02	42 634,61	58 628,36	38%
Total emissions pr year [t CO2e] (location-based)		29 275,28	43 209,06	59 181,92	37%

*Change from 2023: expansion to include the Group's subsidiaries with more than five employees in Scope 1 & 2, and the Scope 3 categories of business travel and waste. Due to limited data availability, historical data is not included prior to 2023.

*Change from 2024: Scope 3 spend based on the Group's subsidiaries included from reporting in 2024; due to limited data availability, historical data is not included prior to 2023.

*Change from 2023: key purchased materials have been replaced with activity-based data for Scope 3; this was increased in 2024.

*A location-based method is used to calculate Scope 2 emissions, and market-based Scope 2 emissions are disclosed here for information purposes.

*Business travel by air: the majority of data comes from actual trips taken, with the remainder coming from spend data through Visma.

*Emissions factors from EPDs are used for large portions of steel and aluminium purchased.

Carbon intensity

The increase in carbon intensity in 2024 is due to lower turnover, a broader scope of climate accounting and improved data compared with previous years.

Year	2022	2023	2024
Carbon intensity Scope 1 & 2 Emissions per revenue (tCO2e/ mill. NOK)	0,1	0,4	0,4
Carbon intensity Scope 1, 2 og 3 Emissions per revenue (tCO2e/ mill. NOK)	22,5	29,6	46,6
Revenue (mill. NOK)	1302,40	1461,40	1270,00

*Revenue in value presented in million NOK is used to calculate this value.

*Revenue for 2024 is based on a preliminary estimate, as final revenue was not available when this report was written.

*Carbon intensity is calculated for tCO2e from a location-based approach.

Scope 1

Scope 1 emissions amount to 460.65 tCO₂e, or less than 1% of the Group's total emissions.

From 2023 to 2024, we have reduced direct emissions by 10%. Electrification has been a key climate measure, and in recent years the Group has been keen to invest in electric vehicles.

97% of direct emissions come from fuel for the Group's own and leased vehicles in operations, while the remaining 3% come from fossil fuels used in operational activities.

Scope 2

Scope 2 emissions account for less than 0.5% of the Group's total emissions.

Greenhouse gas emissions from electricity consumption, calculated using a location-based approach, increased by 49% in 2024 compared with 2023, while the market-based approach shows an increase of 29%.

The increase is partly due to the expansion of locations in Northern Ireland and the UK, higher productivity in production in Latvia, and increased use of electric vehicles charged with electricity from our own locations. Variations in electricity consumption may also have contributed to the increase.

The largest locations, such as the head office and warehouses in Norway, Denmark, Sweden and Latvia, have reported electricity consumption based on actual kWh, while other locations and regional offices have estimated consumption. District heating is also used in Sweden. The majority of electricity consumption comes from purchased energy.

The head offices and warehouses in Denmark and Sweden are equipped with solar cells, and this share is therefore not included in Scope 2 emissions. The Group does not currently use guarantees of origin (GO) for its electricity consumption. In the future, the Group will be able to influence emissions by reducing energy consumption at several of its warehouses and offices.

Scope 3

Scope 3 emissions amount to 58,628 tCO₂e, or 99% of the Group's total emissions.

These emissions originate from various sources, such as purchase of goods and services, transport (both upstream and downstream), waste management and business travel. Although Scope 3 is not directly under our control, we can influence emissions to a large extent through our requirements, and choice of suppliers and products.

To identify the emission categories in Scope 3, we use a spend-based method, where our purchase statistics are imported, categorized and further classified into Scope 3 categories. This gives us a good overview of emissions. Categories with no emissions are therefore not material.

The focus has also been on obtaining activity-based data from our largest transport and waste suppliers, EPD (where available), as well as purchase volumes from steel and aluminium suppliers and the Group's business travel. The work of obtaining activity-based data will continue to be a key focus area in the coming years.

Scope 2	Denmark	UK & Northern Ireland	Latvia	Norway	Sweden	Total Hallgruppen Locations
2023						
Sum of Emission Estimate (tCO ₂ e) (Market-Based Electricity Emissions)	25,0	10,39	118,76	288,22	31,20	473,56
Sum of Emission Estimate (tCO ₂ e) (Location-Based Electricity Emissions)	3,17	5,54	26,67	7,22	19,88	62,48
2024						
Sum of Emission Estimate (tCO ₂ e) (Market-Based Electricity Emissions)	30,71	37,83	182,93	323,22	33,86	608,56
Sum of Emission Estimate (tCO ₂ e) (Location-Based Electricity Emissions)	3,89	20,81	41,08	8,10	19,02	92,91

*The table shows the Hallgruppen's total Scope 2 emissions specified per country using a market-based and location-based approach.

Scope 3

Purchased goods and services

Purchased goods and services account for 94.4% of our total emissions and are the largest source of emissions in the Group.

In the future, emissions related to materials will be a focus area. We are actively working to obtain activity-based data from material suppliers and use EPDs or other emission factors to calculate climate emissions more accurately. This strengthens the data quality and increases knowledge about materials that can contribute to emission reductions. Going forward, we will work on setting environmental criteria for suppliers and quantifying this work.

Capital goods

The share of emissions for capital goods is 0.1% of our total emissions. Emissions in this category are from upstream activities purchased in the reporting year.

Upstream transportation and distribution

Transport accounts for 4.3% of our total emissions and is the second largest emission category.

This category includes all external transport purchased on behalf of the Group, regardless of whether it is upstream or downstream.

We are working to obtain emissions reports from our transport providers to improve our data and increase our knowledge of how we can reduce emissions over time. The increase in emissions in this category is due to an improvement in the data available over the past year.

Waste generated in operations

Waste accounts for only 0.02% of our total emissions.

This category includes all waste for which Hallgruppen is responsible through our waste agreements in the reporting year. We have a strong focus on waste reduction, especially at construction sites, and work actively to improve sorting rates in order to minimize waste with high emissions. Our core business generally generates little waste, but reducing emissions from waste remains an important goal.

Emissions have decreased over the last three years as a result of improved data. They have remained relatively stable over the last two years despite overall growth, which compensates for a decline in the construction division in 2024.

Emissions have been stable and low over the last two years due to the transition to better activity-based data for waste.

Business travel

Business travel (air travel and mileage) accounts for 0.3% of our total emissions.

Despite lower turnover in 2024, activity levels in the Hallgruppen have been high, with an increase in the number of employees and locations, and our sales activities require a lot of travel. This has led to an increase in emissions, particularly from air travel, over the past year.



Hallgruppen moving forward

Going forward, we will strengthen our commitment to reducing greenhouse gas emissions, including through increased energy efficiency and further electrification of transport solutions and our own vehicles. The organisation can also influence emissions by imposing strict environmental requirements on suppliers and establishing measurement parameters for supplier assessment based on environmental requirements, particularly with regard to the procurement of raw materials with a low carbon footprint or transport.

Climate accounting and climate targets are an important part of our management system, and we will ensure that our policies, guidelines and operating procedures reflect our commitment to reducing our climate impact.

Energy

Energy is a material topic for the Hallgruppen, particularly in view of its upstream and downstream impact on the value chain.

The extraction and production of our key materials remain energy-intensive processes, and the transition to renewable energy requires time and investment from our suppliers. In the meantime, high energy prices and rationing may pose a risk. However, on the other hand, we can contribute to reduced energy consumption among our customers through energy-efficient solutions.

We recognise that measuring energy consumption in the value chain is challenging, as it is largely indirect. Today, we mainly measure our own energy consumption, which includes electricity for offices, warehouses, production facilities and charging our vehicles. The increase in consumption from 2023 to 2024 is due to higher productivity in Latvia, expansions in the UK and Northern Ireland, and increased use of electric vehicles that are charged either at our locations or externally.



	Denmark	UK & Northern Ireland	Latvia	Norway	Sweden	Total Hallgruppen Locations
2023	42 897	26 739	221 826	481 477	262 067	1 035 006
District heating kWh					78 600	78 600
Electric vehicles kWh	3			5 718		5 721
Electric vehicles kWh	42 894	26 739	221 826	475 759	183 467	950 685
2024	52 701	93 903	341 698	539 948	312 714	1 340 964
District heating kWh					72 227	72 227
Electric vehicles kWh	6 284			7 098		13 382
Electric vehicles kWh	46 417	93 903	341 698	532 850	240 487	1 255 355
Endring %	23	251	54	12	19	30


*The table shows electricity consumption in kWh related to the Hallgruppen Group's total electricity consumption.



Save electricity with our insulated structures!

Our customer in Kolding, Denmark, is reducing both its electricity consumption and environmental footprint with a new 1,350 m² insulated warehouse supplied by Hallgruppen. The warehouse is equipped with insulated fabric cover and electric doors, which provide good temperature control all year round – and are particularly energy-efficient during the winter months.

Our structures can be delivered with various cladding options, such as insulated fabric, sandwich panels or steel cladding – all with a long life span and requiring minimal preparation.

 [Read more about the project](#)





Hallgruppen moving forward

We will look at our own measures for reduction in the future, however Hallgruppen's focus going forward will be on working more actively with key upstream material suppliers through environmental requirements that can stimulate energy efficiency in production processes and investments in renewable energy, and incorporating this into policies and procedures as part of our strategic supplier work.

When it comes to our customers, it will be important to advise them on choosing product solutions that can help reduce their energy consumption.

Resource outflows and Waste

This is a material topic for Hallgruppen, as important input factors for our products are aluminium, steel, insulation and technical coated fabric. These materials come from non-renewable natural resources, with challenging extractive processes.

Further, it is significant as we have some waste associated with our own warehouses and locations, but primarily because material recycling and waste are linked to downstream project deliveries. In general, setting up a temporary structure generates considerably less waste than a traditional building, as there are minimal on-site built solutions in our projects. Our temporary building projects generate little waste per square meter of structure built, and therefore there are no significant costs associated with waste management. At the same time, material recycling is important as aluminium and steel have high recyclability, and recycling solutions are generally good both upstream and downstream. However, we are aware that the waste and recycling solutions associated with coated fabric are not optimal at present, but we are closely monitoring the development of technology that enables the recycling of coated fabric.

To ensure the most responsible processes and the lowest waste from production of products we purchase before they arrive at our facilities, we have integrated environmental considerations, waste minimization and maximization of recycling into our Supplier Code of Conduct.

The structures have a circular design in which steel and aluminium are solid and durable materials, and the coated fabric has long durability, it is easy to repair and can be adapted so that the structures have high potential for reuse through dismantling and relocation.

Other examples of circular design include the use of repair kits and replacement of individual sections or parts. Our standard temporary structures come with a repair kit that can be used to carry out minor repairs yourself, avoiding the need to replace the entire fabric. In the event of an accident and the damage is greater than what the repair kit can handle, the structures are designed so that it is not necessary to replace the coated fabric on the entire structure, but only the section with damage.

We measure both the total amount of waste, the type of waste and the sorting rate from our warehouse facilities, production and project deliveries to customers, and have agreements with professional waste disposal companies for the handling of our waste and material recycling. Furthermore, data is collected based on reports and invoices from these waste disposal companies used in the Group.

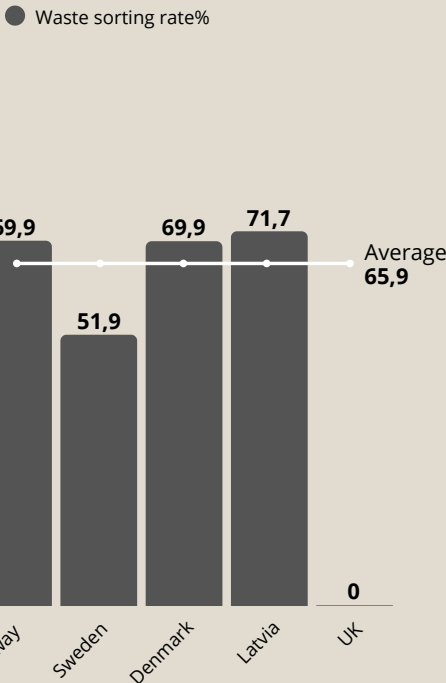
Waste sorting rate

Hallgruppen measures the waste sorting rate for all companies in the Group

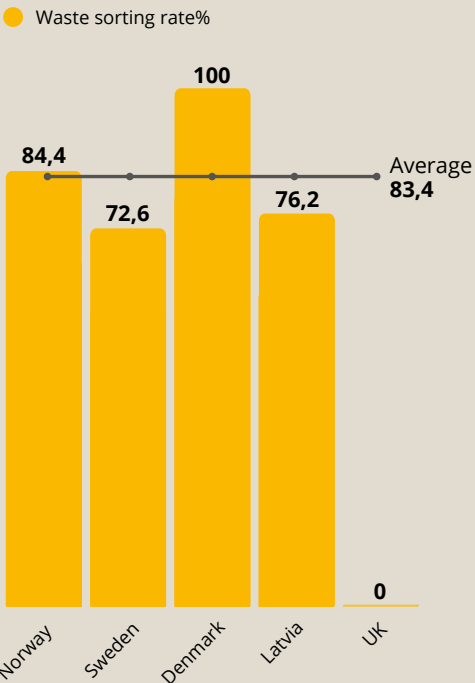
To minimize our impact, Hallgruppen has a target of 80% waste sorting. The largest waste Groups consist mainly of mixed commercial waste, wood and metals.

Our data is based on information through our agreements with professional waste disposal companies for the handling of our waste.

2023
Waste sorting rate%



2024
Waste sorting rate%



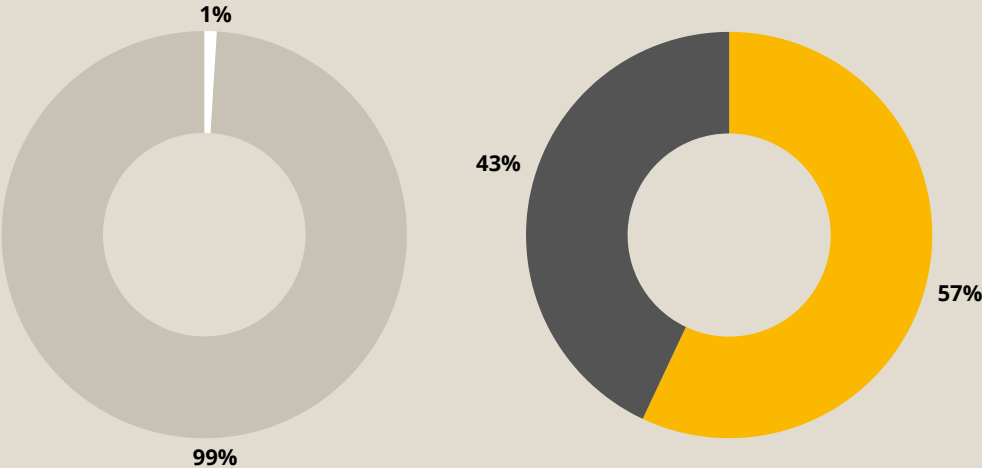
Total waste summary

Hallgruppen has seen a 3.2% reduction in total waste volume from 2023 to 2024, which is in line with the decline in turnover from 2023 to 2024. In 2024, we dedicated resources to gaining an overview of waste types and flows in the Group.

	Tonnes	Tonnes	% of total
	2023	2024	
Total Hazardous waste	1,27	3,73	1
Total Non-Hazardous waste	564,31	543,58	99

	Tonnes	Tonnes	% of total
	2023	2024	
Total Diverted from disposal (recycled)	255,60	314,66	57
Total Diverted to disposal (non-recycled)	309,97	232,65	43

- Total Hazardous waste
- Total Diverted from disposal (recycled)
- Total Non-Hazardous waste
- Total Diverted to disposal (non-recycled)



	Tonnes	Tonnes	Change %
Resource outflow - waste	2023	2024	
Hazardous waste Diverted from disposal	0,01	-	-100,0
Prepare for reuse	-	-	
Recycling	0,01	-	
Other recovery operations	-	-	
Non-Hazardous waste Diverted from disposal	255,59	314,66	23,1
Prepare for reuse	-	-	
Recycling	255,59	314,66	
Other recovery operations	-	-	
Hazardous waste Directed to disposal	1,25	3,73	197,3
Incineration (including for energy recovery)	1,25	3,73	
Landfilling	-	-	
Other disposal operations	-	-	
Non-Hazardous waste Diverted from disposal	308,72	228,92	-25,8
Incineration (including for energy recovery)	302,82	222,80	
Landfilling	5,90	6,12	
Other disposal operations	-	-	
Total waste generated	565,58	547,30	-3,2

*Data has been collected based on waste reports and invoices from local waste disposal companies in all of the Group's locations

*The table has been compiled by Hallgruppen based on information about underlying waste types that is publicly available on Norsk Gjenvinning's website <https://www.norskgjenvinning.no/no/avfallstyper>

*Incineration includes energy recovery



From construction tent to Norway's largest reuse centre – with Hallgruppen

In collaboration with Statsbygg, Circular Resource Centre (Sirkulær Ressurssentral) and Oslo Municipality, Hallgruppen has transformed a former construction tent from the Government Quarter, into Norway's largest reuse centre – Ombygg – covering a total of 4,500 m² in Økern.

The construction tent was dismantled for Veidekke, transported to a new location, where Hallgruppen, on behalf of Statsbygg, restored and modified it before the tent was rebuilt. The project shows how temporary structures can be given new life and value and contribute to a more circular construction industry.

The reuse of the structure sends a strong signal about the importance of thinking circularly and seeing the value in what would otherwise be considered waste. Our flexible coated fabric structures have a long life span and can be used as both temporary and permanent installations – a clear example of this in practice.

The reuse center is now a hub for the reuse of building materials. Here, materials, equipment and installations are given a new purpose – which cuts waste, saves resources and reduces emissions. The reuse center is a powerhouse for the circular economy and a real solution for sustainable construction processes. The environment surrounding the Circular Resource

Centre and the National Knowledge Arena for Reuse in the Construction Industry is now one of Norway's largest networks and a driving force for a circular construction industry.

Hallgruppen is proud to contribute flexible, reusable solutions that support the UN's sustainability development goals and promote sustainable development.



[Read more about the project](#)



Hallgruppen moving forward

Hallgruppen has a good starting point for a coherent and effective circular strategy. Going forward, we will work more purposefully to increase resource utilisation upstream, thereby reducing waste downstream.

We will achieve this by focusing on product design with better utilization of key materials upstream, optimizing production, conducting life cycle assessments (LCA) and facilitating repair, reuse and recycling. Upstream, we will focus on environmental requirements for our suppliers (also beyond our Supplier Code of Conduct and focus on EPDs), so that we contribute to reducing waste and achieving a lower climate impact as a whole.

To improve our waste management practices, both at our storage facilities and in project deliveries, good metrics and indicators will be crucial going forward. Increased sorting rate and reduction of waste overall from production, packaging and project deliveries will be a high priority, along with monitoring relevant environmental indicators.

The development of better recycling solutions, particularly for coated fabric, is an area we will monitor closely and evaluate further in the future.

The durability and reuse potential of our structures should receive increased attention in the future. Most of our structures can be dismantled and reassembled, which enables long-term reuse.

Social conditions

Social aspects of sustainability are central to Hallgruppen, both in our own operations and in our value chain, and continue to be an important focus moving forward.

Our material sustainability topics within social issues are central to our group management system and are ensured through policies, guidelines and operating procedures that reflect our commitment to adapt. Responsibility for managing and operationalizing topics related to social issues is divided between different departments and roles.

Responsibility for managing and operationalizing issues related to our own employees is divided between the senior manager for HSE, Quality and Sustainability, and HR. All matters related to health and safety (HSE) are the responsibility of HSE. Issues related to employment conditions, benefits, ethical guidelines, freedom of association and collective agreements are the responsibility of HR, which also handles other issues such as discrimination, equality and inclusion on behalf of Hallgruppen's own employees.

Responsibility for managing and operationalizing matters related to workers in the value chain is carried out by the Group's Sustainability Manager, which includes conducting due diligence assessments and integrating sustainability into projects and departments.

We have strengthened our systematic work on social sustainability issues through clear responsibility allocation and integration into the management system.



Working conditions - own workforce

This is an important topic for Hallgruppen, as good working conditions and health and safety are important factors in ensuring stability, low sick leave and a safe workplace, as our employees are an important resource for Hallgruppen. Overall, this makes it easier to attract and retain the right skilled personnel, which is important for growth. Our industry is traditionally male dominated, which means that diversity, equality and inclusion remain issues that require attention.

At the same time, we work in an economic exposed industry, and with parts of the business characterized by heavy workloads, unfavorable working hours and hazardous work, which increases the risk of injuries, accidents and human error.

Safe and regulated working conditions

All employees in Hallgruppen shall have safe and regulated working conditions. This includes secure employment, fair practices, compensation for working hours and freedom to organize. In our subsidiaries in Sweden and Denmark, there are collective agreements, and annual salary adjustments are made in line with the collective agreements.

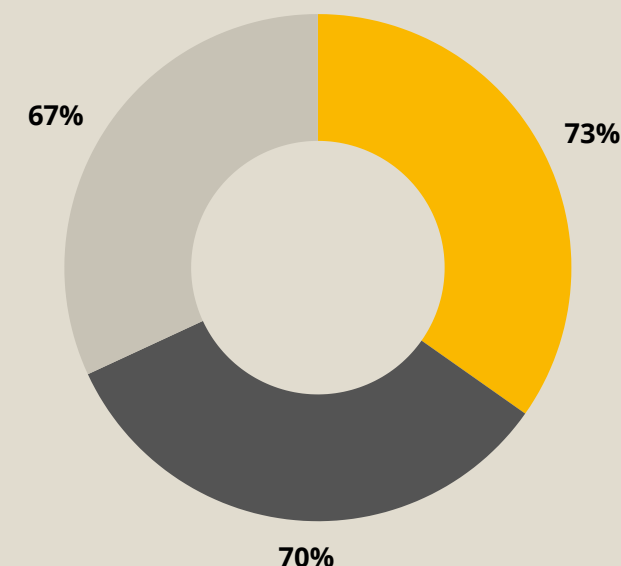
Hallgruppen is committed to the 10 principles of the UN Global Compact. Our Code of Conduct sets a common standard for responsible behavior within the group and is rooted in the company's values. The guidelines were last updated in 2024 and have been approved by the CEO.

Creating a sustainable work culture requires more than routines – it requires a clear commitment to responsibility and long-term thinking.

Hallgruppen internal ethical guidelines (Code of Conduct) are part of the new employee onboarding process, which includes signing of the Code of Conduct, as well as mandatory online training for all employees.

2024 Hallgruppen online training

- Code of Conduct
- IT Security
- Whistleblowing



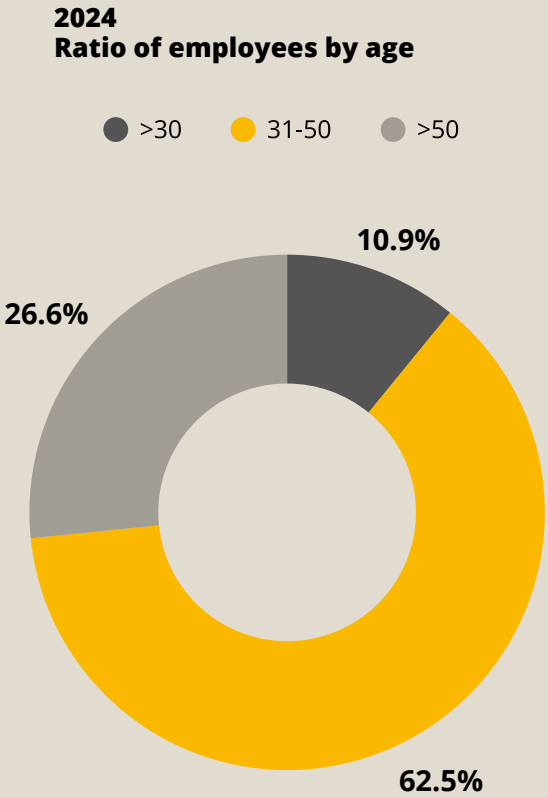
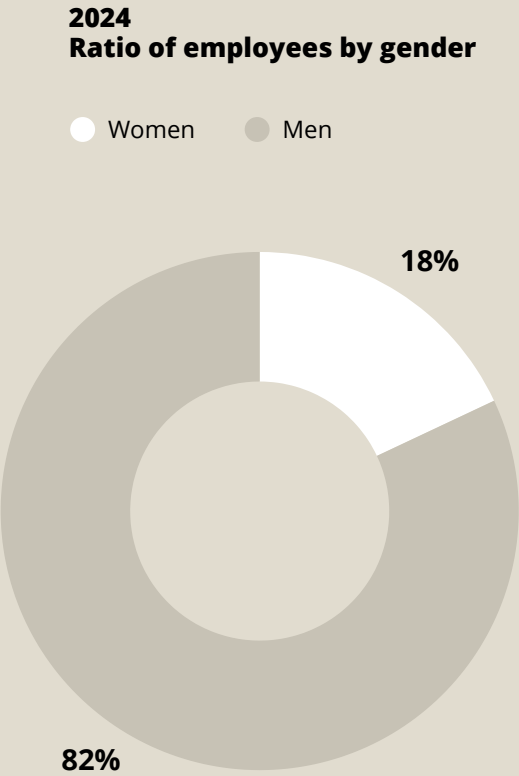


Hallgruppen internal ethical guidelines (Code of Conduct) cover the following topics:

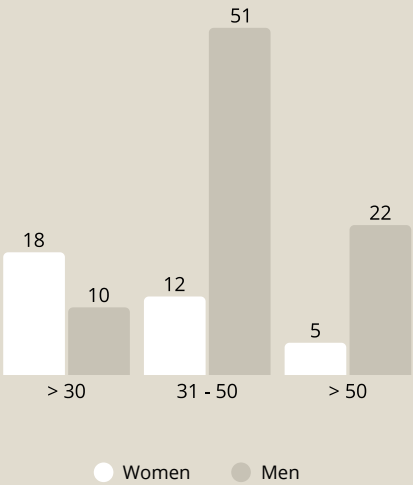
- Ethical conduct and integrity
- Competition
- Anti-corruption and anti-money laundering, bribery, gifts and hospitality
- Sanctions and trade controls
- Health and safety
- Quality and professionalism
- Transparency and communication
- Confidential information
- Conflict of interest
- Diversity and inclusion
- Responsibility and social commitment
- Human rights, child labour and forced labour
- Freedom of association
- Terms and conditions of employment
- Drugs and alcohol
- Privacy
- Whistleblowing

Diversity, equality and inclusion

In 2024, Hallgruppen had a 18% ratio of women in the group and a 33% ratio of women on the board, which was an increase from 2023. Overall, the number of employees is highest among those aged 30-50, followed by those over 50, and lowest among those under 30. The gender balance follows the same pattern, with the highest proportion of women aged over 30.

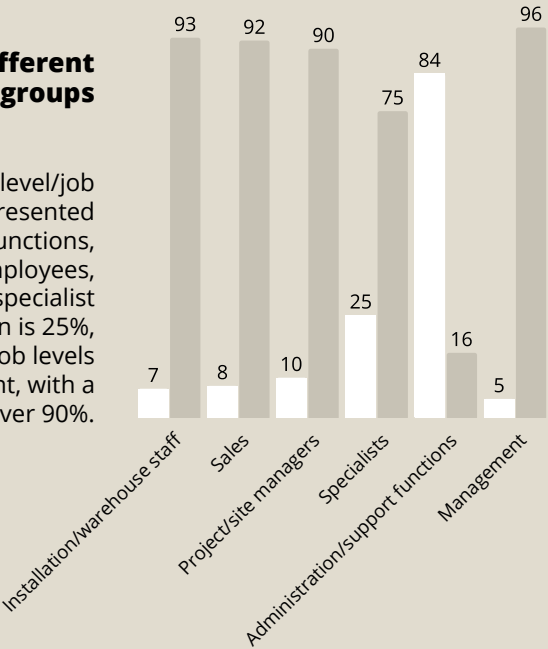


Ratio of employees in% by gender and age

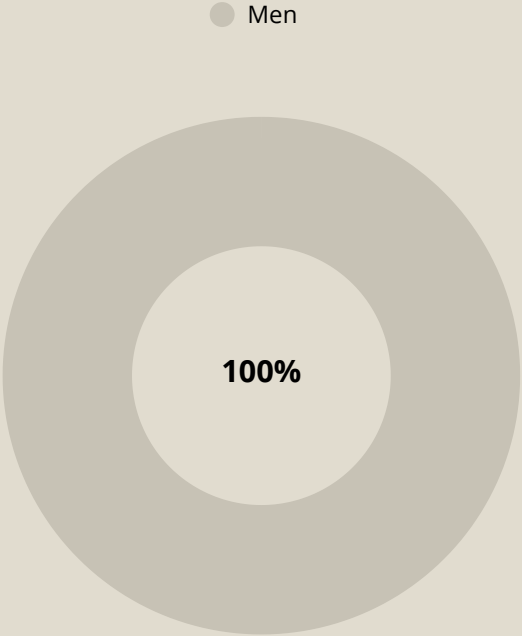


Gender ratio at different job levels/job groups

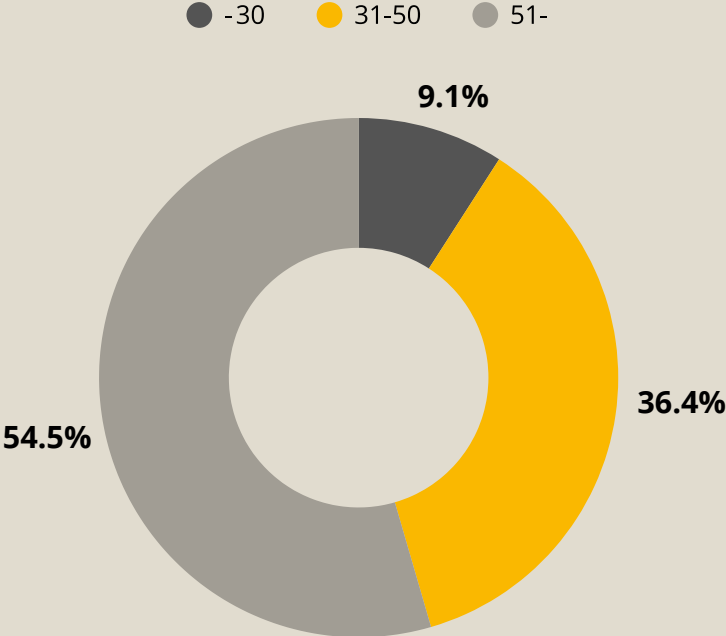
In terms of breakdown by job level/job group, women are most strongly represented in administration and support functions, where they account for 84.2% of employees, compared with 15.8% of men. In specialist functions, the proportion of women is 25%, while men account for 75%. In other job levels and groups, men are clearly dominant, with a share of over 90%.



Ratio of the management team by gender

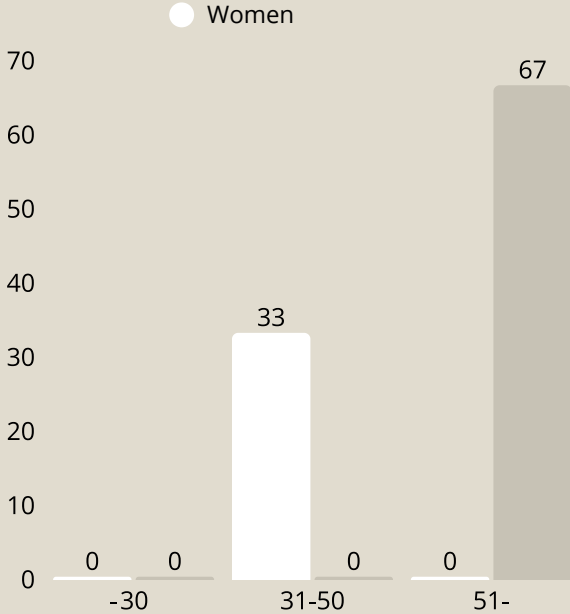


Ratio of the management team by age



Ratio of the board in % by gender and age

Gender balance on board increased in 2024 to 33%. The board consists of three individuals and complies with current expectations and new requirements for gender balance on the board.





At Hallgruppen, we work to promote equality and prevent discrimination based on gender, pregnancy, parental leave, care responsibilities, ethnicity, religion, beliefs, disability, sexual orientation, gender identity, gender expression – and combinations of these factors.

Diversity, equality and inclusion are integrated into our HR management policies, and we have zero tolerance for discrimination.

Our personnel handbook states that ‘we want a culture characterised by high competence and quality of work, freedom with responsibility and respect for the individual’. This helps to emphasise that we focus on our employees being able to achieve a good balance between work and family life, which contributes to greater inclusion.

✓ **Pride**
Logo with Pride colours in the background

✓ **International Women’s Day on March 8th**
Focus on how female employees experience working at Hallgruppen

In 2024, no reports of incidents of discrimination, consequences or follow-up were registered on our reporting channel.

In accordance with the Norwegian Activity and Reporting Obligation (ARP), Hallgruppen AS published an equality report for the Norwegian part of the business in 2024, which can be found on our website.

Health and Safety in Hallgruppen

In accordance with Norway's Internal Control Regulations and relevant legal requirements, Hallgruppen has established its own management system for health and safety (HSE) and works actively to improve it on an ongoing basis. The management system for work environment and safety covers all employees, temporary staff and subcontractors who carry out work on behalf of Hallgruppen. For Hallgruppen, HSE is a particularly high priority area in connection with our project deliveries, as the greatest risk factor is linked to our physical work on construction sites. HSE-operations is mainly managed through processes and systems in the Norwegian part of the business, while some of Hallgruppen's locations outside Norway have local adaptations and routines.

Risk management and preventive measures

Hallgruppen identifies and assesses risks associated with its activities at an overall level, focusing on factors that may affect physical or mental health and safety. This is reviewed annually based on changes in the Group and management systems, and an annual action plan with risk-reducing measures is prepared in collaboration with the company's occupational health service.

With regard to risk assessment in projects, an overall risk assessment is carried out at the start of each project, which then forms the basis for the project's HSE-plan. Those involved in the project have a duty to provide ongoing feedback and report any new risks or changes in conditions that affect safety during project delivery, thereby ensuring that the risk assessment is up to date and used as a basis for decision-making in both planning and execution.

At the construction site and before start-up, the installation team conducts a systematic review

of the local risk factors both on and around the assembly area. The aim is to identify local hazards and ensure that the necessary measures are implemented before work begins. It is important for safety that the assemblers have thorough knowledge of the various work operations and the risks associated with the various activities, and therefore competence requirements are set for each individual assembler. For all assignments, the assemblers must familiarize themselves with the project-specific conditions that may involve risk or be a source of danger to safety or the working environment.

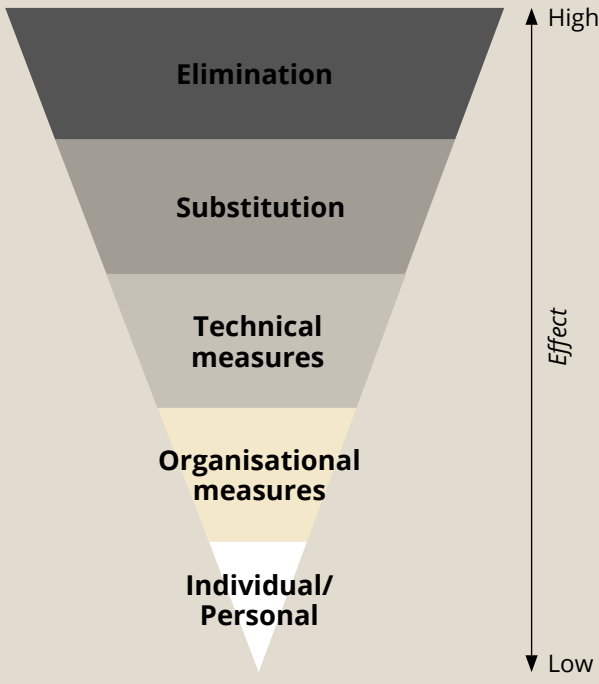
For all activities that involve risk, the primary aim is to change the method or introduce measures that eliminate the risk as a whole. Unfortunately, this is not always possible, and in such cases we strive to put in place physical barriers that reduce the likelihood of an incident occurring. We then implement measures to ensure that, if an incident does occur, it will have the least possible impact on personnel and equipment in the area.

Everyone who works for Hallgruppen should thrive at work and come home from work every day safe, healthy and unharmed

- Hallgruppen's HSE policy

Our activities related to lifting and assembling steel and aluminium structures, as well as working at heights, carry an inherently higher risk than other tasks and are therefore subject to a high level of focus during project implementation. If necessary, a separate Safe Job Analysis is prepared for the specific work operation.

All incidents that occur on the construction site are reported in the company's deviation management system and used to assess where measures should be implemented. In the event of incidents that cannot be handled on the construction site, the company's emergency response plan must be followed, which involves the Group's management for support so that the situation can be handled in the most appropriate manner. In extraordinary situations, the Group's crisis response plan is implemented. For incidents of high severity, an investigation is conducted to identify the cause and implement corrective measures to prevent recurrence.



Work-related injuries and health

We are continuously working to improve the performance indicators related to work-related injuries and health.

The figures presented in this report relate exclusively to the parent company Hallgruppen AS in Norway and cover 77 of the Group's total of 160 employees as of 2024.

The reason for this is that there are currently some challenges with consolidating data from our subsidiaries in various countries, partly due to different requirements and reporting bases. Today, the majority of our own employees in roles with higher HSE risk are associated with our Norwegian operations. Most of our subsidiaries consist of sales activities.

Work-related health

With regard to *work-related health*, we systematically report sick leave among our own employees, as this is a key indicator of the working environment and employee health. Sick leave increased from 2023 to 2024, mainly due to long-term sick leave as a result of non-work-related incidents. Sick leave in the company in 2024 can be linked to physical illness and some mental health issues.

Despite this increase, Hallgruppen's sick leave rate of 4.60% is significantly below the industry average. Measures are in place to minimize sick leave and to enable flexible sick leave arrangements to a greater extent.

Work-related injuries

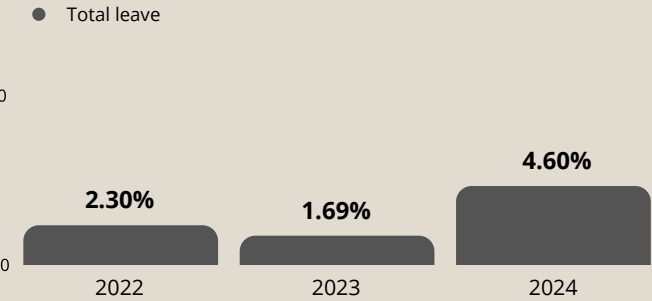
When it comes to *work-related injuries*, we measure the number of injuries that affect the company's Lost Time Injury Frequency Rate (LTIFR). The definition of LTIFR-injuries is 'personal injuries with absence beyond the day of the accident' and the LTI Frequency Rate is defined as 'Number of these injuries per million hours worked'.

All undesirable incidents and conditions that affect safety, health and the working environment are reported and dealt with in Hallgruppen's internal HSE system. Measures and areas for improvement are documented and followed up systematically.

Most of the incidents reported are minor in nature and have low potential for injury, while the most serious incidents consist of crushing injuries related to the assembly of support structures.

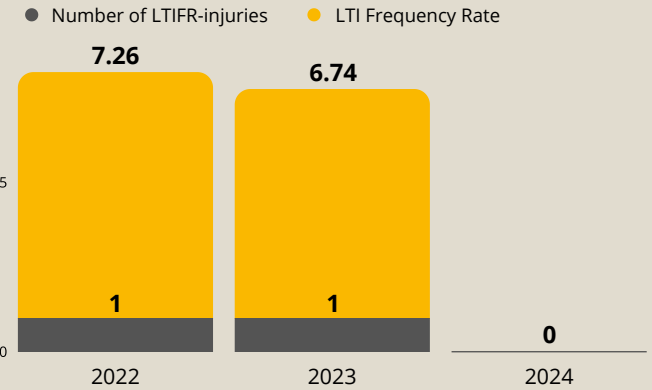
Over time, Hallgruppen has achieved a reduction in the LTI Frequency Rate, and no injuries were recorded in the reporting year, which indicates effective preventive work and a strengthened HSE culture.

Sick leave



* The numbers shown only include Hallgruppen AS (Norway)

Injury frequency



* The numbers shown only include Hallgruppen AS (Norway).

* The reported LTIFR doesn't include subcontractors (UE), as HG doesn't have access to data and hours.

* There are changes happening in how HSE numbers are reported, so the number of hours worked for 2024 isn't shown.

Occupational health service and safety representative

Hallgruppen is registered with an external approved occupational health service with which we work closely. This is a key element of our preventive and systematic HSE-work and for promoting employee health. The occupational health service acts as a professional resource, providing support in various areas of HSE-tasks, such as risk assessment, follow-up and training.

Furthermore, Hallgruppen has health and treatment insurance for its employees. This helps ensure that more employees receive quick assistance and return to work faster. The insurance has been very well received. Hallgruppen employees in locations other than Norway have similar or other arrangements through collective agreements.

Employee participation and communication on health and safety in the workplace is ensured through elected employee representatives at local level, either regulated by collective agreements, regulations or laws, where required.

In the Norwegian part of the business, the elected employee representatives are the safety representatives. The safety representatives are responsible for safeguarding the interests of employees in matters relating to the development, implementation and evaluation of HSE and the work environment in the workplace. We have three safety representatives, each responsible for their own dedicated area, and one of the safety representatives acts as the chief safety representative with responsibility for coordinating safety work across the areas. In addition, we have a Working Environment Committee (AMU) that holds at least two meetings a year, attended by the organisation's CEO, HSE manager, HR manager and safety representatives, as well as a representative from the company's occupational health service.

In larger projects of a more long-term duration, project-specific safety rounds are conducted every other week, together with the other project participants on site, including the customer.

HSE training and development

Training and development are an important part of Hallgruppen's HSE work and provide an excellent opportunity for us to work proactively with our health and safety efforts. Hallgruppen therefore offers a wide range of HSE-courses across the organisation, some of which are mandatory for everyone regardless of position, while others are optional.

All Norwegian safety representatives must complete a basic course in occupational health and safety, known as the 40-hour HSE-course. All our assemblers are required to complete a sling and hook course and a personnel lift course. In addition to this, selected assemblers have a certificate for the use of lifts and forklifts, as well as a certificate for carrying out hot work.

Regular training in basic first aid and the use of defibrillators is offered to all employees so that they are prepared if they experience an accident, whether this happens at work or outside working hours.

There is a requirement to complete two compulsory web-based courses focusing on attitudes related to HSE on construction sites. These are the courses:

- ✓ **'Project Hazard Blind'**
- ✓ **'Dangerous Patterns',**

The courses have been developed jointly by the construction industry through Sfs BA (Norwegian non-profit organisation) and provide training in the most hazardous work operations and situations that typically arise on construction and civil engineering sites. The aim is to strengthen risk understanding, increase awareness of dangerous situations and reduce the likelihood of serious incidents.

Everyone who is working at Hallgruppen must have completed and passed these courses before starting work.

HSE impacts on third parties

Hallgruppen's customers come from many diverse segments. In some cases, these are private companies where HG's HSE system sets the guidelines for project implementation, but we also carry out projects for large public and private customers with their own high standards for health, safety and project execution. We use these projects for learning and experience sharing, so that we can continuously improve our processes and methods.

Our impact on adjacent operators and third parties varies greatly depending on the complexity and location of the projects. Therefore, our template for project-specific risk assessments includes factors such as neighbours and the public who may experience an interface with our activities and operations.

Many of our largest customers use software to monitor seriousness, HSE practices and environmental impact in projects. This helps the project to maintain an overview of the contractual chain, simplifies our follow-up of guidelines in accordance with our Supplier Code of Conduct, and helps to combat labour market crime.



Hallgruppen moving forward

To ensure a consistent approach to its own workforce going forward, Hallgruppen will focus on enforcing the same guidelines, policies and working methods across all Hallgruppen locations.

When it comes to enforcing internal policies, including Code of Conduct, greater emphasis will be placed on increasing the implementation rate of the Group's own courses on these topics.

Several courses on the topic of management may be considered in the future, including a course on conducting employee appraisals for managers, which was published in 2025. In addition to this, an employee survey for the entire group is also planned for 2025. These activities will be an important part of the Group's arena for dialogue with employees in the future, in order to map well-being and the working environment and to help strengthen the cooperation, motivation and goal achievement required to develop the organisation in the desired direction.

With regard to the company's HSE work, we have chosen to focus on strengthening existing efforts in the coming years, as the majority of our own employees in roles with higher HSE risk are associated with our Norwegian operations. Furthermore, the challenges of coordinating statistics and incident management across all countries

represent a comprehensive and long-term project that cannot be prioritised for the sake of statistics alone.

We will therefore review the occupational health service in 2025 to ensure that it meets the company's needs. Several providers will be evaluated, with the aim of entering into a new agreement from 2026. Furthermore, the goal is to increase the frequency of safety rounds at offices and warehouses in Norway to quarterly. In the long term, the company's occupational health service will also be invited to participate in these safety rounds in order to obtain a third-party assessment of risks and potential incidents.

From 2025, Hallgruppen will follow up and report on existing HSE indicators, including sick leave, HSE incidents and non-conformities, on a monthly basis. This will provide a better basis for identifying trends over time, including any seasonal variations. In connection with this work, a course will be launched on how to prepare incident reports in the company's incident management system within HSE, quality and the external environment, which will help to increase the focus on incident reporting and improve the data quality of our reporting of HSE indicators.

This will enable us to better identify HSE challenges related to project deliveries and subcontractors.

Working conditions - workers in value chain

Working conditions in the value chain are an important issue both upstream and downstream because they affect our ethical responsibility for human rights and decent work, legal requirements such as the Transparency Act, the company's long-term business sustainability, and the accountability and trust this gives us with our customers.

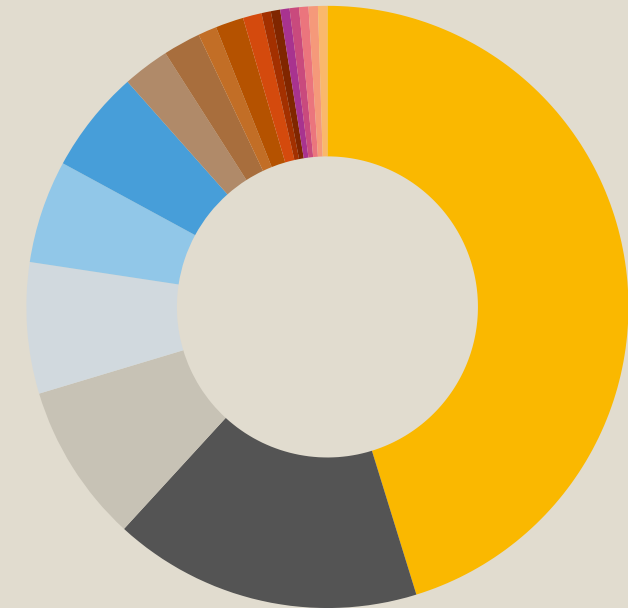
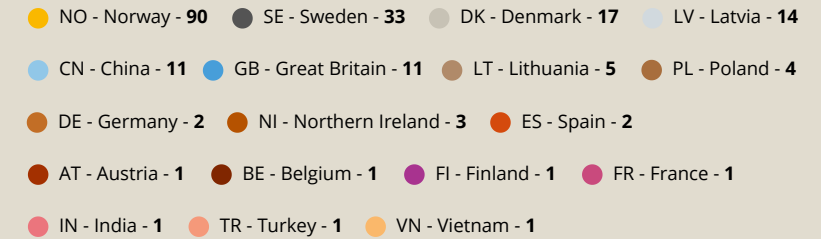
There is a particular risk of negative impact in countries and segments with an elevated risk of human and labour rights violations, as well as a lack of transparency, such as supplier production in China or subcontractors in the assembly phase. Hallgruppen has a real opportunity to influence these conditions positively, through clear requirements, due diligence assessments, audits and close cooperation with suppliers, among other things.

In 2024, we made significant progress in our due diligence work in Hallgruppen. We included a larger part of the supply chain from our subsidiaries in our risk assessment.

Our Supplier Code of Conduct was significantly upgraded, and one of our customers conducted on-site audits at three of our Chinese suppliers in 2024.

We actively work to ensure responsible working conditions throughout the value chain – from requirements and assessments to close cooperation with suppliers.

Suppliers divided by country of origin



This is how Hallgruppen works with due diligence assessments:

Embed responsible business conduct

Hallgruppen is committed to the UN Global Compact's 10 principles in the areas of human rights, labour, environment and anti-corruption. As part of our due diligence, we update our policies, risk assessment, findings and necessary measures as required. An annual report is published with detailed information about this work. It is well established in the management and board, who are committed to their obligations.

In 2024, we updated our Supplier Code of Conduct to a more detailed policy document for our suppliers. This defines our expectations regarding responsibility and is a key tool in our dialogue with suppliers on sustainability and responsibility in the value chain. The procedures for distributing and following up the Supplier Code of Conduct were also updated.

Policy and procedures:

- ✓ **Supplier Code of Conduct**
- ✓ **Procedure for fulfilling obligations under the Transparency Act (updated 2024)**
- ✓ **Procedure for supplier audits (audit plan) (NEW 2024)**
- ✓ **Procedure for minimum requirements for new suppliers (NEW 2024)**

2024 was a year focused on implementation and enabling implementation. The Group allocated resources and established a separate Group function for Quality, HSE

and Sustainability consisting of three employees, with the Sustainability Manager leading the organisation's work on due diligence assessments.

Hallgruppen Supplier Code of Conduct covers the following topics:

Policy for Responsible Business Conduct

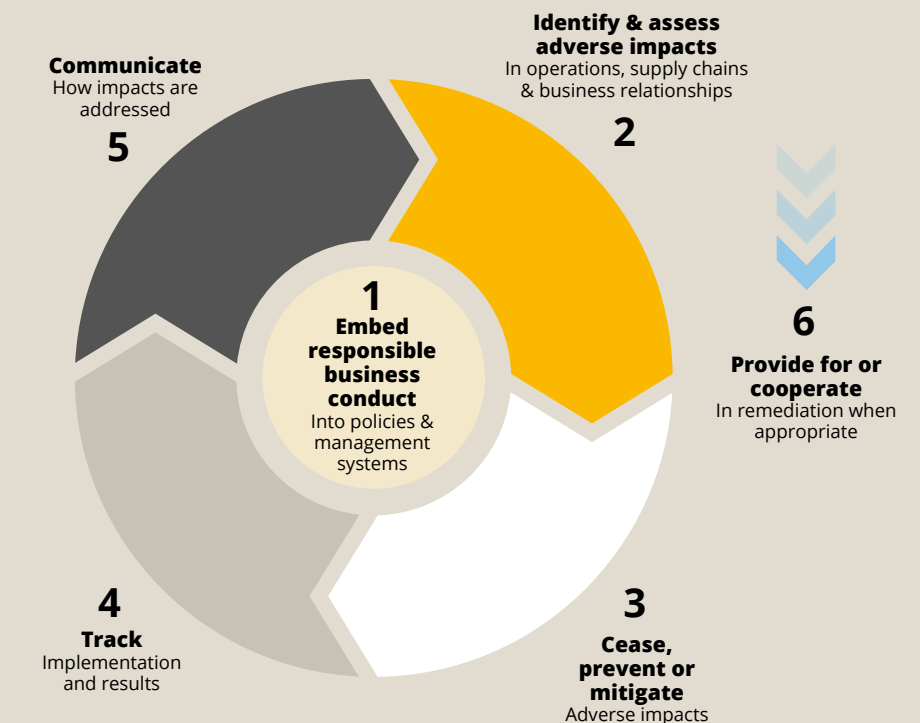
- General obligations and scope
- Continuous Improvement, management, monitoring and evaluation
- Visit, inspections and audits
- Breach of Code of Conduct

Supplier Code of Conduct

- Compliance with the law
- Fair business conduct and fair competition
- Anti-corruption, AML, bribery, gifts and hospitality
- Sanctions and trade control
- Freedom of association and the right to collective bargaining
- Forced or Compulsory Labour
- Child Labour
- Discrimination
- Wages, Working Hours and other Conditions of Work
- Health and Safety
- Harassment, Harsh or Inhumane Treatment
- Environment
- Chemical and Hazardous Materials
- Wastewater and Solid Waste
- Air emission
- Minimize Waste, Maximize Recycling

The OECD model

Hallgruppen uses the OECD methodology with its six steps that show how companies can work more responsibly and sustainably.



Risk assessment

For our work with potential negative risk, Hallgruppen uses a tool from Ignite Procurement to assess the supply chain, with a particular focus on social risk assessed according to geography, industry and purchase value. This formed the basis for prioritising high-risk suppliers. In total, 98.4% of the Group's purchase value was mapped (199 suppliers), of which 11.3% was classified as high social risk. These are now prioritised for further measures and follow-up.

Prioritised negative impact/damage	Topic	Country
Steel, aluminium, coated fabric and sandwich panels	Health and safety	China Vietnam Turkey Baltic
	Trade union and collective bargaining	
	Wages, working hours and regular employment	
	Forced labour	
	Discrimination	
	Corruption	
Prioritised negative impact/damage	Topic	Country
Subcontractors	Health and safety	Great Britain and Northern Ireland
	Trade union and collective bargaining	
	Wages, working hours and regular employment	
	Forced labour	
	Discrimination	

In relation to *actual negative impact*, third-party audits were conducted at three suppliers in China in 2024, in collaboration with the customer. The audits identified some non-conformities in relation to wages, working hours and HSE conditions. These were addressed through specific action plans, follow-up meetings and thorough documentation reviews.

Measures to cease, prevent or mitigate negative impacts

Based on our latest risk assessment, we have improved existing measures and developed new ones to clarify how the Group will work systematically with risk areas going forward.

Through these initiatives, Hallgruppen is continuing its work to ensure that both the company and our suppliers comply with high standards of ethical business practice.

Based on the assessment, the following measures have been implemented and planned:

Measures	Results (expected / achieved)	Status
1. Upgraded Supplier Code of Conduct	Expected: Clarify requirements and reduce risk through supplier management	Completed 2024
	Achieved: 75% of suppliers have approved new version; 100% of critical suppliers have signed	Follow-up 2025
2. External social audit (2024) Co-operation with customer and 3rd party	Expected: Identify breaches and areas for improvement	Completed 2024
	Achieved: Supplier improvements in HSE, wages and working hours	To be completed in 2025
3. New procedure and plan for social audit	Expected: Systematic compliance with the Code of Conduct and handling of deviations with concrete measures	Planned completion 2025
	Expected: Structured work with quality, environment and HSE. Reduced social and health risks	Finalised for GB
4. ISO certification (9001, 14001, 45001)	Achieved: Hallgruppen Ltd. ISO certified March 2025	Norway/ Northern Ireland planned 2025
	Expected: Standardised process and minimum requirements for ensure quality and sustainability	Implemented 2024
6. Strategic supplier plan	Expected: Increased collaboration and transparency with key suppliers on procurement, sustainability and human rights	Commenced 2024

Track implementation and results

The sustainability manager has overall responsibility for monitoring both the implementation and results of the measures, in collaboration with relevant experts within the Group and/or external parties.

Before entering into new supplier partnerships, a risk assessment is carried out and expectations are communicated through the Supplier Code of Conduct.

At the end of 2024, four of the six measures had been implemented. Several measures will be continued in 2025.

Communicate

Hallgruppen is open and transparent about its work on due diligence and risk, including through the Norwegian Transparency Act statement on our website.

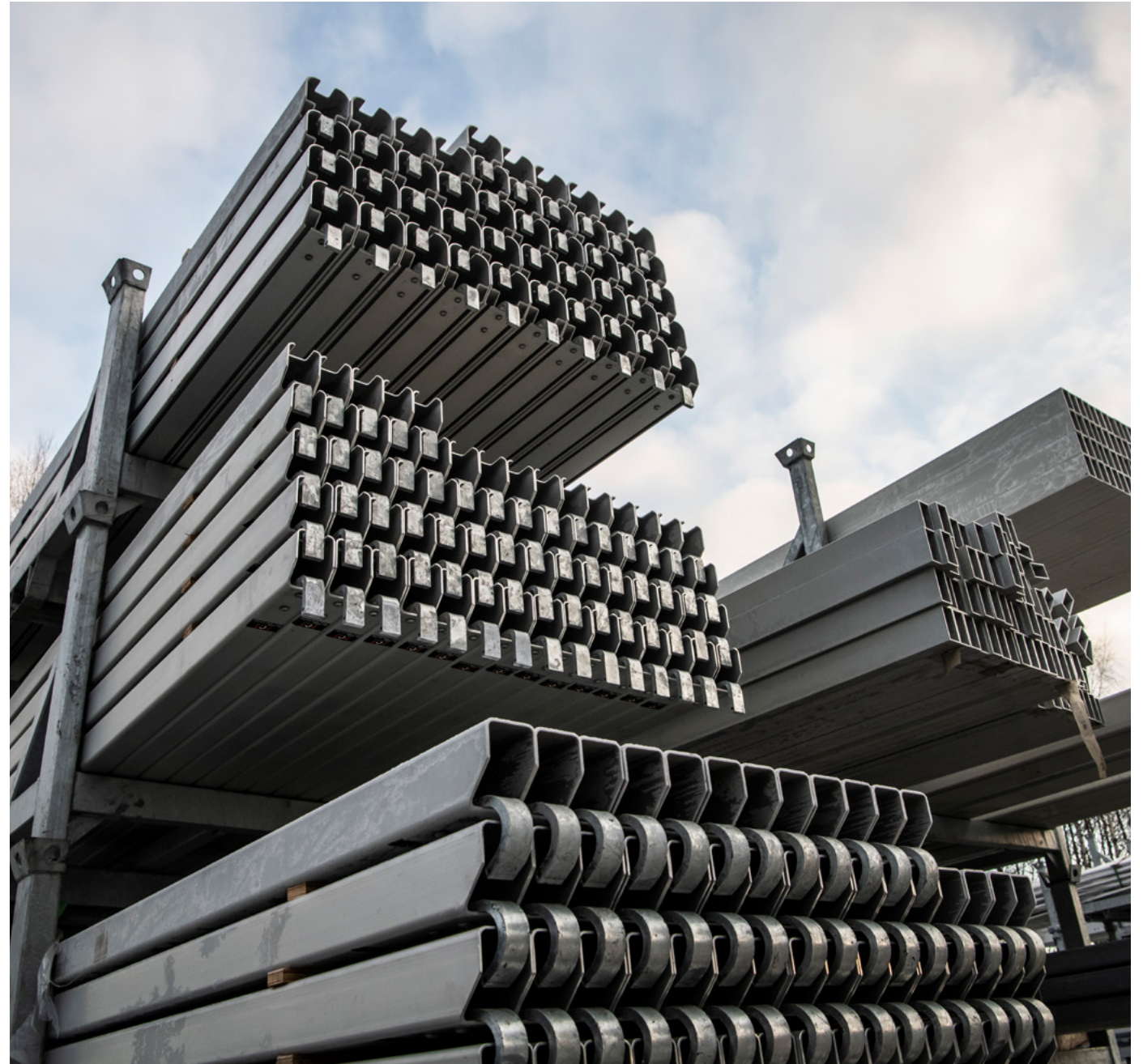
We update our stakeholder mapping as needed and maintain ongoing dialogue with key stakeholders through meetings, online channels, industry forums and audits.

 **Transparency Act (in Norwegian)**

Remediation

Remediation takes place through collaboration, action plans and communication of requirements in the Supplier Code of Conduct, in order to achieve a positive outcome. In 2024, non-conformity was identified, and measures were implemented to change practices and procedures.

Hallgruppen has a reporting channel for both internal and external parties, which is intended to help identify and address human rights and labour rights violations and other violations related to the company's activities.





Hallgruppen moving forward

By working systematically and proactively over time on working conditions in the value chain, we have the opportunity to create positive change, strengthen the company's risk management, supplier cooperation and overall sustainable value creation going forward.

Going forward, we will increase our focus on transparency and the concrete implementation of measures through procedures and plans. The aim is to clarify our expectations to suppliers regarding their handling of human rights and working conditions.

Social audits of selected suppliers will be used as a key tool to identify any non-conformities and to implement necessary improvement measures. This also gives us the opportunity to have a more local presence and develop closer cooperation with key suppliers.

For more information on how we work with due diligence and the Transparency Act, please see our statement published on our website:

 [Transparency Act \(in Norwegian\)](#)

Business practices

Our material sustainability topics within governance and business practices are central to our management system and are ensured through policies and guidelines that reflect our commitment to adapt and develop in these areas.

Responsibility for management and operationalization related to these issues is divided between HR, the Sustainability Manager and the senior manager for HSE, quality and sustainability, who report to the CEO, which has overall responsibility. Internal matters are handled by HR, measurements are followed up by HSE, Quality and Sustainability, and the Sustainability Manager is responsible for following up efforts related to suppliers and partners.

Governance and business practices are at the core – with clear responsibilities and close monitoring.



Corporate culture

A strong corporate culture and high ethical business practices are essential for us to be seen as a serious and reliable partner, and to attract and retain talented employees.

As a relatively young organisation, it is particularly important for Hallgruppen to build on the creativity, flexibility and willingness to change that already exists internally. Our values of ‘Respect – Community – Honesty’ are firmly rooted in our management and organisation.

Our culture is characterized by innovative and knowledgeable people with a high level of commitment to our products, the industry and our customers. We work continuously to be the best in the market, promote development and ensure that we are at the forefront of industry trends in order to maximize value creation and deliver high-quality products. We stand out by seeing opportunities where others see challenges.

We are a forward-looking supplier with a short distance from words to action, leveraging the individual strengths and inherent qualities of our employees, while sharing our expertise and experience with each other

and across all Group locations.

To ensure sustainable, innovative and strong cultural development, systematic and objective measurements of corporate culture and working environment are needed. This reduces dependence on individuals and promotes a more consistent and professional approach to management across the organisation, while preparing the organisation for the implementation of future sustainability initiatives.

Management system

Given the company's strong growth over the past 10 years, it is important to ensure the stability and effectiveness of our management systems. With this in mind, the Group began the process of ISO certification in accordance with NS-EN ISO 9001:2015 and 14001:2015 in 2024.

Based on our values, policies and objectives, we work continuously to include the necessary business areas, including corporate culture and high ethical business practices, in the company's systems and to ensure a scalable and applicable management system. In this way, Hallgruppen has a holistic approach to compliance that involves the entire organisation – across functions and geographical areas.

To ensure the operationalization of the management system, two resources were hired for the Group in the area of Quality, HSE and Sustainability in 2024.

Our goal is to maintain and further develop our ISO certifications across the Group in the years to come. Hallgruppen Ltd. became ISO certified in early 2025.

ISO	Norway	Northern-Ireland	UK	Latvia	Sweden	Denmark	Poland	Finland
9001	In process	In process	ISO certified	In process	Pending	Pending	N/A	N/A
14001	In process	In process	ISO certified	In process	Pending	Pending	N/A	N/A
45001	Pending	In process	ISO certified	In process	Pending	Pending	N/A	N/A

The Group's organisational framework and guidelines

In order to strengthen the focus on corporate culture and high ethical business practices, several important compliance measures were implemented for employees in the Group during 2024, including:

- ✓ **Code of Conduct - updated 2024**
- ✓ **Supplier Code of Conduct - updated 2024**
- ✓ **Online training of the Code of Conduct (including anti-corruption) across the organisation**
- ✓ **Online training on whistleblowing**

Clear frameworks and guidelines help make sure decisions are made in a consistent and responsible way. Hallgruppen's Code of Conduct apply to all employees, contractors, board members, and anyone else who represents the company. In 2024, the Code of Conduct were revised to reflect changing business requirements and ethical expectations. They are now available in Norwegian and English.

The Group's anti-corruption measures

Corruption undermines fair competition and weakens trust in society. Compliance with ethical guidelines and applicable regulations is crucial for a well-functioning society and business community.

At Hallgruppen, ethical business practices and our anti-corruption work is integrated into both internal and external policies, and the entire organisation and supply chain is assessed for corruption risk. All suppliers and subcontractors are required to comply with our Supplier Code of Conduct, and all employees complete mandatory e-learning on anti-corruption as part of the company's Code of Conduct training.

No cases of corruption were reported in 2024.

Commitment and internal communication

Hallgruppen has a Scandinavian culture characterised by low barriers for dialogue, whistleblowing and voicing opinions. Hallgruppen actively uses various arenas, such as employee appraisals, the working environment committee and the Group intranet, to create commitment and participation. During the onboarding and probation period for new employees, monthly follow-up meetings are held, including mandatory online training on various topics such as whistleblowing.



Freedom, variety and community



Life as a maintenance engineer at Hallgruppen

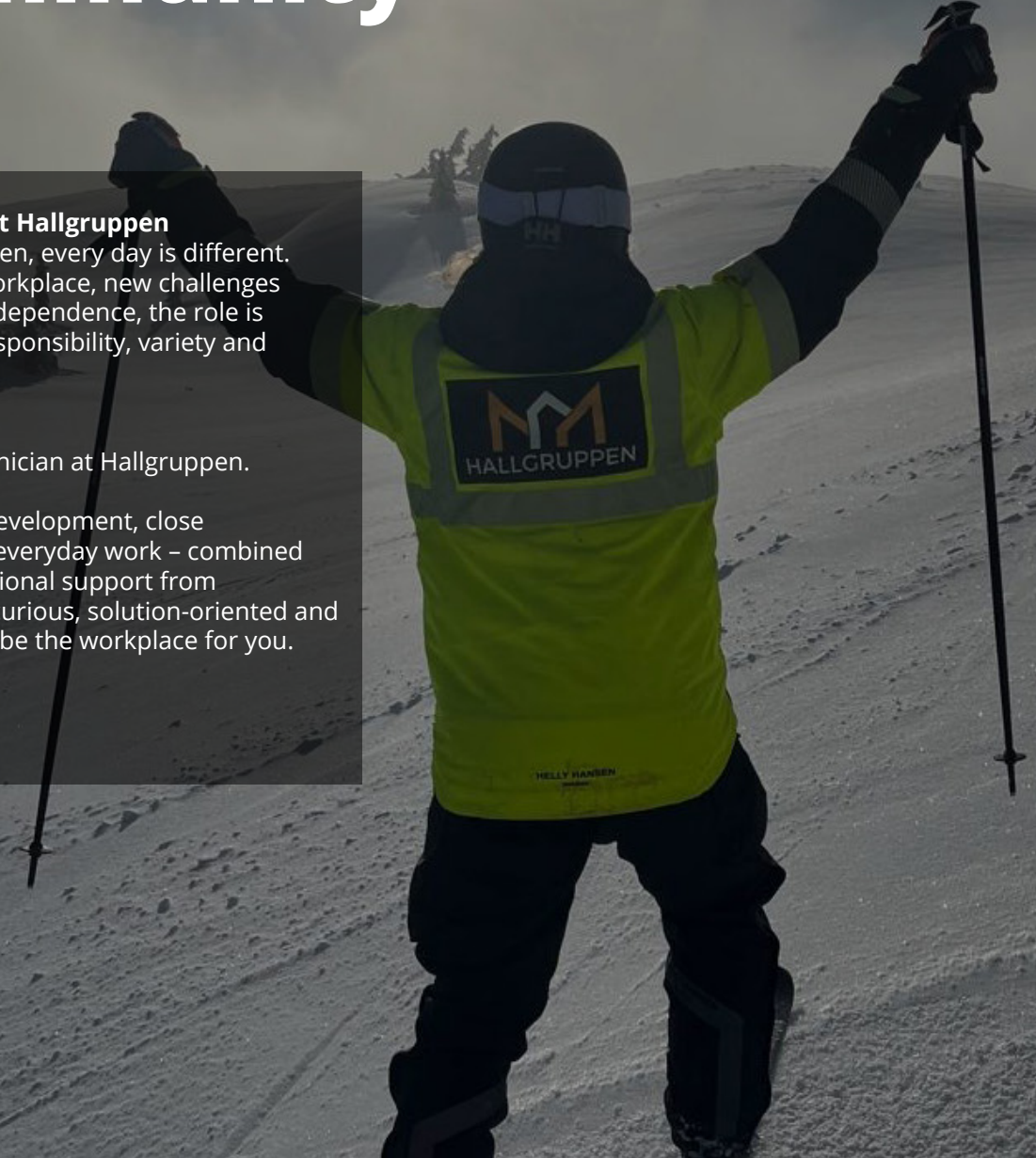
As a service technician at Hallgruppen, every day is different. With the whole of Sweden as my workplace, new challenges every week and a high degree of independence, the role is perfect for someone who enjoys responsibility, variety and practical problem solving.

«It's more of a lifestyle than a job»
says Robert Bönström, service technician at Hallgruppen.

At Hallgruppen, there is room for development, close collaboration and freedom in your everyday work – combined with security, structure and professional support from experienced colleagues. If you are curious, solution-oriented and enjoy working hands-on, this could be the workplace for you.



[Read the article](#)





Hallgruppen moving forward

Corporate culture, including ethical practices, will continue to be a focus both internally and externally.

We are increasing the requirements for our own implementation of internal online training within the organisation.

The launch of employee survey in 2025 will be an important tool going forward. In the future, this measurement will provide more information about the corporate culture and working environment in the organisation. Specific KPIs will be set to measure employee engagement over time.

The Hallgruppen Group is organised with locations strategically located across Europe with local and independent management. The framework (defined through the Hallgruppen management system) with the associated operational responsibilities will be clarified in 2025, and compliance will be monitored. This process will be carried out in connection with ISO certifications and preparations for future ISO certification where relevant.



Appendix 1

The Hallgruppen Group consists of the following companies:

Hallgruppen AS (VAT No. 915846432)

Hagu Rental AS (VAT No. 917294720)

Hallgruppen Sverige AB (VAT No. 5590202379)

Hallgruppen Aps (VAT No. 386114886)

Hg Ejendomme Denmark AS (VAT No. 42210137)

Hallgruppen Baltics SIA (VAT No. 40203186254)

Hallgruppen Oy (VAT No. 3297993-8)

Hallgruppen Ltd. (VAT No. HRB37278HB)

Hallgruppen GmbH (VAT No. HRB37278HB)

Hallgruppen Sp. Zo.o (VAT No. 0001043163)

Hallgruppen N.I. Ltd. (NI713537)



Appendix 2

Stakeholder dialogue

The table provides an overview of the Hallgruppen’s most important stakeholders, where we engage with them, what is significant to them, and our approach to stakeholder engagement.

Stakeholders	Meeting place	Topics of interest to stakeholders	Follow-up and measures
Board of directors	Board meetings	Corporate governance Revenue and growth Compliance	Corporate reporting
			Information through meetings
			Sustainability report
			The Transparency Act report
Employees	Probationary period and appraisal interviews Daily dialogue with colleagues and managers Meeting activities New employee onboarding	Working environment Working conditions and salary Opportunities and challenges	Involved in annual performance reviews with immediate manager
			Involved through employees’ daily dialogue with managers
			Internal communication channels, AMU
			Fixed course programme for new employees, incl. Code of Conduct
Customers	Customer meetings Tender documents Ongoing dialogue Seminars and events	Collaboration on challenges and opportunities Expectations beyond the contract Price, delivery performance, complaints, ESG Code of Conduct and human rights LCA/EPD	Customer dialogues with key customers on topics such as sustainability, environment and climate
			ISO certification/EcoVadis
			Transparency
			Contribute to sustainable development with measures and reporting
Suppliers/ subcontractors	Supplier meetings Ongoing dialogue	Ensure good and serious suppliers Collaboration on ESG issues Human rights	Dialogue with customers in and about projects
			Membership of UN Global Compact, Green Point Norway
			Co-operation agreements/contract clauses
			Other requirements such as EPD/LCA
Competitors and other similar businesses	Supplier Code of Conduct	Strategy/ESG Pricing Competitive culture	Supplier meetings and factory visits
			Social audits
			Keep up to date on competitors strategies and sustainability efforts
Regulatory authorities / legislation	Contact with political environment and authorities through industry organizations Through customers in the public sector	Seriousness Compliance with laws and regulations Ethical operations and practices	Comply with laws and regulations
			Have good processes for compliance
Society and/or local community	Participation in industry forums Profiling, information and dialogue	Seriousness, job creation and environment	Initiate dialogue
			Profiling
The industry	Participation in industry forums Publications	Compliance with standards and frameworks	Dialogue and meetings
			Memberships

Appendix 3

UN Sustainable Development Goals

The Hallgruppen's prioritised SDGs goals:



Goal 8: Decent Work and Economic Growth

8.8 *Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment*

We are committed to promoting decent work and sustainable economic growth through our internal guidelines and HSE policies. Through our Supplier Code of Conduct and strategic partnerships, we ensure responsible and sustainable business practices throughout the value chain that promote good working conditions.

In own operations we place great emphasis on a supportive and inclusive working environment that promotes a good work-life balance. By following clear ethical guidelines and establishing working environment committees, we ensure full employment, fair working conditions and compliance with applicable labour laws. Furthermore, we maintain both internal and external reporting channels to ensure transparency, integrity and compliance with ethical standards.



Goal 12: Responsible Consumption and Production

12.4 *By 2020, achieve the environmentally sound management of chemicals and all wastes throughout their life cycle, in accordance with agreed international frameworks, and significantly reduce their release to air, water and soil in order to minimize their adverse impacts on human health and the environment*

Through product documentation from our suppliers, such as FDV, LCA, and EPD, we can ensure that we collaborate with suppliers who manage these aspects in the most optimal way throughout the product lifecycle.

12.5 *By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse*

We work continuously to reduce our negative environmental impact. Our products are designed to be dismantled and reused, in line with a circular and sustainable approach.

To ensure responsible use of resources, we focus on proper waste management through prevention, reduction, recycling and reuse within our own organisation, with the aim of achieving the highest possible sorting rate. These expectations also extend to our suppliers, including through ethical guidelines for suppliers.



Goal 13: Climate Action

13.1 *Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries*

Our tents can play a crucial role in adapting to climate-related hazards such as natural disasters, providing protection, food storage, or temporary accommodation. They can also be dismantled and relocated, minimizing environmental impact compared to traditional buildings, as they require less groundwork. Additionally, their carbon footprint is significantly lower than that of conventional structures.

13.2 *Integrate climate change measures into national policies, strategies and planning*

We will report our greenhouse gas emissions annually and work towards setting reduction targets. In the coming years, Scope 3 emissions will receive increased attention. Therefore, we are consciously shifting from spend-based to activity-based data, as this provides a more accurate representation of our emissions, enabling us to implement strategic reduction measures.



Goal 17: Partnerships for the goals

Strengthen the means of implementation and revitalize the Global Partnership for Sustainable Development

Collaboration is key to our success in sustainability and the necessary transformations. We are open to new partnerships within our value chain and beyond, as strong collaborations are vital to achieving sustainability goals. And our Suppliers are key, therefore Hallgruppen's Supplier Code of Conduct is signed by our main suppliers. Success is not achieved alone!

Therefore, Hallgruppen is a member of the UN Global Compact, the UN initiative for sustainable and socially responsible policies and practices.

UN Sustainable Development Goals

The UN SDGs we contribute to through our own operations:



Goal 3: Good health and well-being

Ensure healthy lives and promote well-being for all at all ages

We prioritise the health of our employees, offer additional health insurance beyond the public healthcare system, occupational health services, gym facilities, employment training and development.



Goal 5: Gender Equality

Achieve gender equality and empower all women and girls

Focus on promoting equality and diversity within our own organisation, as well as promoting our values in this area throughout the value chain through our Supplier Code of Conduct.



Goal 16: Peace, justice and strong institutions

Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels

Through our Scandinavian values and global presence, we have a strong focus on anti-corruption. We do not accept or participate in any form of corruption or bribery. To ensure compliance, we have clear guidelines and policies, as well as training for employees as part of our Code of Conduct training. This helps to raise awareness and prevent unethical behaviour.



Goal 2: No Hunger

End hunger, achieve food security and improved nutrition and promote sustainable agriculture

We contribute by supplying our Mobile Storage Unit (MSU), which is used to store food in response to emergency relief efforts. We stock large quantities of tents, giving us the capacity to deliver up to 10,000 m² of warehousing facilities in a single day to support the UN's food programs.



Goal 9: Industry, Innovation and Infrastructure

Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation

Contribute to economic development by providing temporary purpose-built structures at a more affordable cost than permanent buildings, thereby making the construction of hospitals, warehouses, and other facilities possible that otherwise would not have been built.



Appendix 4

Global Reporting Initiative

GRI STANDARD/ OTHER SOURCE	LOCATION	OMISSION		
		Requirement(S) Omitted	Reason	Explanation
General disclosures				
GRI 2: General Disclosures 2021	2-1 Organizational details	Hallgruppen AS, Karoline Eggens vei 3, 2016 Frogner, Norway. Org.nr: 915846432		
	2-2 Entities included in the organization's sustainability reporting	Appendix 1		
	2-3 Reporting period, frequency and contact point	Annual 01.01.2024 - 31.12.2024 3		
	2-4 Restatements of information	This is Hallgruppen's first report. 3		
	2-5 External assurance	N/A		
	2-6 Activities, value chain and other business relationships	7-8		
	2-7 Employees	7		
	2-8 Workers who are not employees	Not reported.	Information unavailable/incomplete	Information not available due to contractual restrictions
	2-9 Governance structure and composition	10		
	2-10 Nomination and selection of the highest governance body	The board of directors is elected in accordance with the Norwegian Companies Act (Aksjeloven)		
	2-11 Chair of the highest governance body	Chairman of the Board is not senior executive in the organization Hallgruppen AS.		
	2-12 Role of the highest governance body in overseeing the management of impacts	10-11		
	2-13 Delegation of responsibility for managing impacts	10-11		
	2-14 Role of the highest governance body in sustainability reporting	10		
	2-15 Conflicts of interest	Part of our policies 5 (31)		

Hallgruppen AS has reported in accordance with the GRI Standards for the period 01.01.2024-31.12.2024.

GRI 1: Foundation 2021








Global Reporting Initiative

GRI STANDARD/ OTHER SOURCE	LOCATION	OMISSION			
		Requirement(S) Omitted	Reason	Explanation	
General disclosures					
GRI 2: General Disclosures 2021	2-16 Communication of critical concerns	Part of our policies 5			
	2-17 Collective knowledge of the highest governance body	10-11			
	2-18 Evaluation of the performance of the highest governance body		Not reported.	Information unavailable/ incomplete	Lack of data.
	2-19 Remuneration policies		Not reported.	Confidentiality constraints	
	2-20 Process to determine remuneration		Not reported.	Confidentiality constraints	
	2-21 Annual total compensation ratio		Not reported.	Confidentiality constraints	
	2-22 Statement on sustainable development strategy	5-10 Appendix 3			
	2-23 Policy commitments	5, 30-31, 40 and 46	Not reported.	Information unavailable/ incomplete	Information not available due to contractual restrictions
	2-24 Embedding policy commitments	5, 10, 30-31, 40 and 46			
	2-25 Processes to remediate negative impacts	5, 30-31, 39-43 and 46			
	2-26 Mechanisms for seeking advice and raising concerns	Part of our policies 5			
	2-27 Compliance with laws and regulations	5, 10 and 45			
	2-28 Membership associations	5			
	2-29 Approach to stakeholder engagement	11 and Appendix 2			
	2-30 Collective bargaining agreements	Part of our policies 5 and 30-31			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	11			
	3-2 List of material topics	11			




Hallgruppen AS has reported in accordance with the GRI Standards for the period 01.01.2024-31.12.2024.

GRI 1: Foundation 2021



Global Reporting Initiative

GRI STANDARD/ OTHER SOURCE	LOCATION	OMISSION			SUSTAINABLE DEVELOPMENT GOALS (SDG)	UN GLOBAL COMPACT	
		Requirement(S) Omitted	Reason	Explanation			
Klima og Sirkulærøkonomi							
GRI 3: Material Topics 2021	3-3 Management of material topics	12, 13, 17, 22 and 25			    	Environment Principle 7: Businesses should support a precautionary approach to environmental challenges; Principle 8: undertake initiatives to promote greater environmental responsibility; and Principle 9: encourage the development and diffusion of environmentally friendly technologies.	
GRI 201: Economic Performance 2016	201-2 Financial implications and other risks and opportunities due to climate change	13-16	Financial implications not reported	Information unavailable/incomplete			Financial implications not quantified.
GRI 302: Energy 2016	302-1 Energy consumption within the organization	22-24					
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	17-21					
	305-2 Energy indirect (Scope 2) GHG emissions	17-21					
	305-3 Other indirect (Scope 3) GHG emissions	17-21					
	305-4 GHG emissions intensity	17-21					
	305-5 Reduction of GHG emissions	17-21					
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	12-28	Not quantified.	Information unavailable/incomplete			Lack of data.
	308-2 Negative environmental impacts in the supply chain and actions taken	12-28					
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	25-28					
	306-2 Management of significant waste-related impacts	25-28					
	306-3 Waste generated	25-28					
	306-4 Waste diverted from disposal	26					
	306-5 Waste directed to disposal	26					

Global Reporting Initiative

GRI STANDARD/ OTHER SOURCE	LOCATION	OMISSION			SUSTAINABLE DEVELOPMENT GOALS (SDG)	UN GLOBAL COMPACT
		Requirement(S) Omitted	Reason	Explanation		
Sosiale forhold						
GRI 3: Material Topics 2021	3-3 Management of material topics	29, 30 and 39			 	Human Rights Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and Principle 2: make sure that they are not complicit in human rights abuses.bery.
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	35-38				
	403-2 Hazard identification, risk assessment, and incident investigation	35-38				
	403-3 Occupational health services	35-38				
	403-4 Worker participation, consultation, and communication on occupational health and safety	35-38				
	403-5 Worker training on occupational health and safety	35-38				
	403-6 Promotion of worker health	35-38				
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	35-38 39-43				
	403-8 Workers covered by an occupational health and safety management system	35-38				
	403-9 Work-related injuries	36	Not reported.	Information unavailable/incomplete		
403-10 Work-related ill health	36	Not reported.	Information unavailable/incomplete	Lack of data for subsidiaries		
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	32-33				Labour Principle 6: the elimination of discrimination in respect of employment and occupation.
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	32-33				

Global Reporting Initiative

GRI STANDARD/ OTHER SOURCE	LOCATION	OMISSION			SUSTAINABLE DEVELOPMENT GOALS (SDG)	UN GLOBAL COMPACT	
		Requirement(S) Omitted	Reason	Explanation			
Sosiale forhold							
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Our operations and suppliers are assessed, we only report where there is risk found: 29-31 and 39-43				Human Rights Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and Principle 2: make sure that they are not complicit in human rights abuses.	
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	Our operations and suppliers are assessed, we only report where there is risk found: 29-31 and 39-43					
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	Our operations and suppliers are assessed, we only report where there is risk found: 29-31 and 39-43					
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	39-43	Not quantified.	Information unavailable/incomplete		Part of our overall risk assesment	Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining; Principle 4: the elimination of all forms of forced and compulsory labour; Principle 5: the effective abolition of child labour; and Principle 6: the elimination of discrimination in respect of employment and occupation.
	414-2 Negative social impacts in the supply chain and actions taken	39-43					
Forretningskikk							
GRI 3: Material Topics 2021	3-3 Management of material topics	44-46				Anti-Corruption Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.	
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	Our operations and suppliers are assessed, we only report where there is risk found: 39-43 and 46					
	205-2 Communication and training about anti-corruption policies and procedures	46					



2024

Hallgruppen AS