



# Transparency Act Report

## 2022

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## Introduction

### Notes from the Chairman

In today's dynamic world, businesses are progressively embracing responsible practices that foster long-term profitability while positively impacting society and the environment. At Saferoad, we see sustainability management as a vital element for our ongoing success.

By addressing environmental, social, and governance (ESG) issues with transparency, we showcase our dedication to responsible business practices and making a significant difference. We recognize that open communication and transparency are crucial for building trust with stakeholders, and as such, we are devoted to providing clear reporting on our sustainability efforts. This openness allows our stakeholders to hold us accountable and engage in constructive discussions about our ESG performance.

Furthermore, we understand that transparency itself is just one piece of the puzzle. It requires strong leadership to not only cultivate transparency but also translate it into tangible progress. Our leadership team at Saferoad is pivotal in shaping the culture of transparency within our organization. They are the guiding force that ensures our actions align with our commitments. By embedding transparency in the core of our decision-making processes, we offer a clearer picture of our journey towards sustainability and promote a culture of responsibility and accountability.

However, being transparent and having robust leadership are not one-time accomplishments but ongoing endeavours. The real essence of sustainability lies in continuous improvement, which is fundamental to our business model. We acknowledge that we are on a journey of learning and adaptation, one that requires consistent efforts. We are committed to reassessing and refining our sustainability practices to ensure we meet the evolving needs of our stakeholders, the environment, and the broader community.

Our company's goal is to foster a continuous cycle of improvement in sustainability performance, anchored by transparency and strong leadership. By regularly monitoring and assessing our sustainability metrics, we can identify areas of improvement and subsequently devise strategies to enhance our performance. This dynamic approach allows us to consistently make meaningful strides in our ESG journey, thereby supporting our ambition to remain an industry leader in sustainability.

To comply with the Norwegian Transparency Act, we also ensure to provide clear, accurate, and timely information about our operations. This not only aligns us with regulatory requirements but

also reiterates our commitment to transparency, providing our stakeholders with the necessary assurance about our responsible practices.

In conclusion, Saferoad's commitment to continuous improvement, transparency, and leadership forms the bedrock of our sustainability strategy. We are steadfast in our belief that these principles not only ensure compliance with the Norwegian Transparency Act but also pave the way for sustainable growth, fostering trust among stakeholders and contributing to a better world.

## **Introduction**

This statement has been published in accordance with the requirements of the Norwegian Transparency Act. The document covers the full operations of the Saferoad Holding AS, including the Norwegian subsidiaries Vik Ørsta AS, Euroskilt AS, Brdr Berntsen AS, Eurostar AS and Trafikkdirigering AS.

It sets out the steps taken by the Saferoad Group to continue the work to assess, prevent, and mitigate the risks of breaching fundamental human rights and decent working conditions in its own operations, supply chain and business partner and supply chains during the first reporting period of the Transparency Act from July 1st to December 31st 2022.

## Value proposition

### **Who we are and who we want to be as a responsible company**

Saferoad Group's core business is road infrastructure related products and services that provides guidance and safety. The Group offers a broad range of innovative and high-quality products and solutions. We provide products and services in the following categories: Road Safety, light poles & masts, signs & work zone protection and road services.

Our products and services are tailored to contribute to a safer life on the road and shape the future of road safety infrastructure. Dedicated to Vision Zero, Saferoad aims to actively reduce the number of people seriously injured or killed in traffic.

In today's dynamic world, businesses are progressively embracing responsible practices that foster long-term profitability while positively impacting society and the environment. At Saferoad, we see sustainability management as a vital element for our ongoing success. By proactively addressing environmental, social, and governance (ESG) issues with transparency, we showcase our dedication to responsible business practices and making a significant difference. We

recognize that open communication and transparency are crucial for building trust with stakeholders, and as such, we are devoted to providing clear reporting on our sustainability efforts. This openness allows our stakeholders to hold us accountable and engage in constructive discussions about our ESG performance.

At Saferoad, we take our responsibility to having a positive impact on the people and communities where we work very seriously. We are committed to protecting the human rights of people who work throughout our value chain and interact with our products. For many years we have had policies and processes in place to achieve this ambition. By incorporating sustainable practices and innovative solutions into our operations, we position ourselves as an industry leader.

We value our employees' knowledge, skills, and abilities, considering them our most essential resource. We commit to prioritizing their interests, respecting their rights, and adhering to the UN Declaration of Human Rights and International Labour Organization (ILO) standards.

Saferoad strives to offer equal opportunities for personal and professional growth, rejecting discrimination based on gender, age, disability, ethnicity, sexual orientation, or religion. We are devoted to promoting diversity and equality, enhancing representation in recruitment processes, and cultivating an inclusive and open work culture with opportunities for all. We acknowledge that investing in our employees' growth is not only a moral responsibility but also a strategic advantage contributing to the organization's long-term success and sustainability.

By partnering with responsible suppliers who share our commitment to sustainability, we can work together to drive positive change throughout the supply chain.

At the heart of our ESG management approach lies a deep commitment to understanding and responding to the preferences and expectations of our stakeholders on sustainability. Recognizing the importance of these relationships, we have made stakeholder engagement and materiality assessment integral components of our management strategy.

Our approach ensures inclusiveness and comprehensiveness, focusing on six key stakeholder groups that are central to our sustainability strategy:

- **Customers** – We strive to meet the needs and preferences of our customers by providing sustainable products and services, while maintaining transparency in our ESG practices.

- **Suppliers** – By partnering with responsible suppliers who share our commitment to sustainability, we can work together to drive positive change throughout the supply chain.
- **Employees** – Our employees are vital to our success; we foster a supportive and inclusive work environment that encourages their growth and development while integrating ESG principles into our operations.
- **Investors** – We engage with investors to communicate our ESG performance and commitment, ensuring alignment with their values and long-term investment strategies.
- **Regulators** – We collaborate with regulatory bodies to promote a sustainable business environment, adhering to regulations and supporting policies that advance ESG objectives.
- **NGOs** – By working with non-governmental organizations, we leverage their expertise and insights to inform and strengthen our sustainability initiatives.

## Who we are

### Governance

*“At Saferoad, we recognize that sustainability management is essential for our long-term success. We embrace environmental, social, and governance (ESG) principles, which demonstrate our commitment to being a responsible business. We understand the importance of transparency and communication in building trust with our stakeholders and are dedicated to providing clear and accessible reporting on our sustainability efforts” – Bernd Frühwald, Group CEO.*

Saferoad’s Board of Directors has the responsibility to oversee that the company adheres to national regulations and adequately manages any risks related to adverse impacts on human rights and decent working conditions.

All subsidiaries must follow the Group policies.

Our Code of Conduct is signed by all parties who must follow the code. Care, drive and integrity are values that underpin Saferoad, and continues to characterise our work and interactions. We are sure that our values, together with this Code of Conduct shows that we are a responsible



company. Clear requirements and consistent business conduct build trust and loyalty among employees, business partners, customers and communities. Our Code applies to all permanent and temporary employees of Saferoad as well as hired personnel, consultants and any other party who have authority to act on our behalf regardless of location. In addition, the Code also applies to all members of our Board of Directors and Executive Advisors (collectively referred to as “Saferoad personnel”). All Saferoad personnel are each accountable for making a personal commitment to follow our Code. All leaders and managers within Saferoad, regardless of country or location, are responsible for setting the right tone at the top to cultivate a strong corporate culture for ethics and compliance. They are expected to act as role models for ethical conduct, educate and support employees in complying with the Code and underlying policies, perform oversight to detect violations, identify and mitigate compliance risks, and finally yet importantly, promote a culture of speaking up in good faith without fear for retaliation.

Our Supplier Code of Conduct sets out expectations to our business relations, including business partners and suppliers. At Saferoad we promote corporate responsibility and sustainability also in our supply chains. We cooperate closely with our suppliers and business partners in pursuit of this aim. The code outlines our key ethical principles and requirements on issues that can have significant business, legal and reputational consequences if handled improperly. When selecting new business relations, emphasis will be given to social, environmental and integrity standards. This Code covers human rights, workers’ rights, children’s rights, the environment and corruption.

The Supplier Code of Conduct applies to business relations – including contractors, agents and consultants – who have a contractual obligation to comply with it. This includes their employees at all levels, board members, hired personnel, consultants and others who act on behalf of or represent the business relation. Saferoad further expects its business relations to use their best efforts towards ensuring that equivalent standards are complied with and respected within their own sphere of influence, in particular by their own suppliers.

Business relations to the Saferoad Group are to supply goods and services that are produced in compliance with applicable laws, regulations and this Code. Moreover, they are to communicate the Code to their sub-contractors, and to monitor implementation. They must be able to document compliance with the Code at Saferoad’s request. Such documentation may take the form of self-declaration, follow-up meetings, due diligence by external service provider and/or inspections of the working conditions at production sites in the sole discretion of Saferoad. The supplier will be obliged to name and provide contact information of any sub-supplier that Saferoad wishes to inspect.

Suppliers shall comply with applicable laws and regulations of their country of origin as well as with applicable laws and regulations of countries where they operate. Suppliers are expected to act in accordance with relevant international conventions and guidelines set by international organisations, including by the United Nations and the Organisation for Economic Co-operation and Development. Where differences exist between applicable laws, regulations and the Supplier Code or requirements of the contract with the supplier, suppliers shall follow the strictest requirements.

The Corporate Social Responsibility Policy includes a short description of strong corporate culture, respect for human and labour rights, HSE, anti-corruption, responsible marketing practices, responsible sourcing, money laundering, whistleblowing and compliance with legislation and regulation.

Saferoad has a group-wide Health & Safety program. The program consists of tools to assist management and employees in identifying critical and potential risks, as well as routines to help employees identify risks in their daily work. All risks that have been identified should be reported to prevent future accidents. We closely monitor any and all accidents related to our employees, regardless of the severity of the accident and we take continuous action to improve. Local management is responsible to ensure that each site represents a safe working environment and that systems, to enable safe work, are in place. Each employee has the right and the obligation to stop unsafe work and to report accidents, near misses and unsafe conditions.

## **Roles and responsibilities**

We promote responsible procurement practices, ensuring our suppliers maintain ethical standards and uphold human rights and labor conditions. Our commitment to supply chain transparency and worker health and safety allows us to create a more sustainable and ethical foundation for our products.

The Group company has its own procurement department, which assists the group subsidiaries in their procurement. Saferoad's Procurement Policy is based on our Values, and our Code of Conduct and Corporate Social Responsibility Guidelines. Saferoad's Code of Conduct, Corporate Social Responsibility Guidelines, Contract Management Policy, and Corporate Compliance Program are operational guidelines for our behaviour during the procurement process. Saferoad manages risks through signed Supplier Code of Conduct, supplier self-assessment questionnaire and audits.



Saferoad Group works to build good partnerships with suppliers through fair trading in line with laws and regulations on procurement and with the highest international ethical business standards. We ask our suppliers to consider ESG carefully in accordance with international standards and the UN Global Compact. The purpose of this self-assessment form is to give us a better insight into overall quality measures, ESG and environmental activities of our suppliers.

**Content in self-assessment questionnaire:**

- 1 Supplier Code of Conduct
- 2 Saferoad company you supply goods or services to
- 3 Contact information
- 4 General Questions
- 5 Questions for quality-certified companies (ISO or other quality standard)
- 6 Questions for environmentally certified companies (ISO for other environmental standard)
- 7 Questions for non-certified companies
- 8 Other certificates
- 9 Other comments
- 10 Signature

## The content of the supplier audit template is:

- 1 Supplier profile
- 2 Production capacity
- 3 Equipment & Technology
- 4 Leadtime
- 5 Pricing
- 6 R&D and technical support
- 7 Quality management system
- 8 Accreditation
- 9 Procurement
- 10 House keeping
- 11 HSE
- 12 Fraud and Bribery
- 13 Child labour
- 14 Working hours
- 15 Understanding and Compliance

## Our products and services

Saferoad Group is a leading road safety supplier in Europe with 75 years of experience within the industry. The Group employs 2 500, with 19 production units and 30 sales offices across 13 countries in Europe. Our headquarter is in Oslo. The Group also exports products and executes projects in countries outside of Europe. We also have a trading office in China. The group had an underlying revenue of NOK 6 173 million in 2022.

Saferoad Group is owned by FSN Capital V and FSN Capital Bridge Co-Investment, which are vehicles advised by FSN Capital Partners. It was founded in 2007, as a merger between Ørsta Group and Euroskilt Group. Roots go back to 1947 when Ørsta Stålindustri was founded.

## Light poles and masts and other products

This category includes crash-friendly, safe, decorative, and functional light poles and masts. In addition to street lighting, we offer outdoor furniture options and fences, as well as masts and towers for telecom, rail traffic, and power grid. To ensure that our products have a long lifespan, we provide a variety of corrosion protection methods, such as hotdip galvanizing, powder coating,

wet paint, or thermoplastic. We offer towers and hardware for power grids ranging from 1-420 kV, catenary poles for rail traffic, and antenna towers for telecommunications.

We have production facilities in Norway, Sweden and Romania.

## Other products

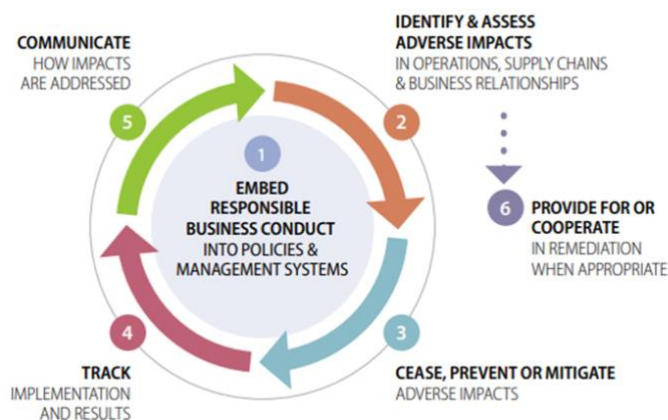
We also sell waste materials back to our suppliers. See section on waste management below.

Product and service category	Group Companies providing products/services
Light Poles & Masts	Vik Ørsta AS (NO), Brdr. Berntsen AS (NO), Vik Ørsta Design AS (NO), Saferoad Smekab AB (SE), Moramast AB (SE), Brdr Berntsen AB (SE), Saferoad Lightpoles Brasov (ROM), Smekab Citylife ApS (DK)

## Process for due diligence

### The Transparency Act and OECD guidelines for multinational enterprises

The Transparency Act and the OECD guidelines for multinational enterprises supports the United Nations Guiding Principles (UNGP) and OECD guidelines for multinational enterprises approach to due diligence and recognises the need to have processes in place to identify, prevent, mitigate, and account for how the impact on human rights is addressed. It is understood that this is an ongoing activity, as risks may change over time in line with operational changes or external influences.



## The process for mapping our own operations, supplier and business partners

### How do we assess risk?

The risk assessment of our suppliers and business partners builds on the list of high-risk products from the Norwegian Government Agency for Financial Management (DFØ) and industries in Norway that has their own set of minimum legal requirements regarding wage and labour rights. The assumption is that such industries are most likely high risk in other countries too. In our risk matrix, the above products and services are considered as high risk. Services and similar risk profiles have been classified as medium or high depending on our knowledge of the industry. Other products and services have been considered as low risk.

DFØ defines products as high risk “[...] when there are systematic documented high risk of human rights abuse occurring in the supply chain, meaning the value chain from raw material extraction to component production until finishing assembling.” The documentation is based on reports and studies by ILO and other relevant sources (for example research reports and reports from acknowledged civil society- and union organisations). To make the list relevant in the daily practise of public procurers, specific product categories have been selected based on Norwegian public procurement activities. The High Risk List is a guidance tool, and not exhaustive. Products not on the list could therefore also be high risk purchase.

The high risk industries are defined by law as the construction industry, the maritime construction industry, cleaning workers, fish processing enterprises, electricians, freight transport by road, passenger transport by road, hotel, restaurants and catering.

For some categories of product/services, the risk depends on the country risk for human rights and decent working conditions. When assessing country risk, we use Global Rights Index, Labour Rights Index and Transparency International’s Corruption Perception Index.

## Significant risk of adverse impacts

### Our own operations

Important areas for Saferoad that are thematically affected by human and worker rights are HSE, diversity and equality, wage and working time regulations and measures against social dumping. These topics are explained in the annual report. Topics that have already been covered through these reports will not be described in more detail in this report, as both risk assessments and identified measures have been explained.

In the mapping of our own operations, we have not uncovered findings of actual negative consequences, or a significant risk of negative consequences related to human or worker rights. Nor have any violations been reported either through the whistle-blower channel, internal audits or the reporting system for deviations during the period.

### Suppliers

Our suppliers typically provide materials, components, services and software that are key inputs in our products and services. This table consists of our supplier categories with significant risk of breaching fundamental human rights and decent working conditions.

Product and service category	Input from our suppliers			
	Materials	Electrical components	Software	Services
Light Poles & Masts	Steel, Chemicals (hot-dip galvanizing, powder coating, wetpaint), Thermo-plastic, Wood-based packaging			Transportation Waste Management

	materials			
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## Services

Saferoad’s primary business usually involves the creation of signs, barricades and other road safety equipment. However, they do also provide services in tangent to the actual products that they produce. This includes transportation, waste management and consulting services.

### *Transportation*

Saferoad provides transportation of their products to the construction site. Transportation is generally a high risk sector as there are frequently long working hours, tight deadlines, vehicles that are unfit to drive, social dumping, low pay and the frequent use of sub-contractors. This could be a potential risk for Saferoad as transport is an integral part of the products and services they provide. However, it is more tangential to the products they deliver compared to e.g. *Materials and electric components*, and therefore assume that would have very little impact on the supplier if extensive demands were set. Saferoad therefore considers it sufficient to use their supplier code of conduct as a way to mitigate this risk as of now. They will however be monitoring the suppliers within the sector and implement additional measures if necessary.

### *Waste management*

Saferoad’s waste management has been a growing part of their business over the last years. They have an extensive amount of waste, including steel, plastic, wood, aluminium, chemicals, electronics and more. This is either sold back to the supplier or taken care of by companies that recycle and collect waste, e.g. Norsk Gjenvinning. Saferoad has ambitions to improve their current recycling system as a measure to improve both their environmental and social footprint.

There are several risks associated with waste management. Working with waste may lead to exposure to dangerous chemicals, as well as a generally hazardous working environment due to heavy lifting and sharp objects. Implementing measures to ensure recycling, especially of raw materials, can also be a useful measure for limiting the need of virgin raw materials and therefore lowering the risk associated with extracting raw materials. This may also have a beneficial environmental impact as well.

## Business Partners

Saferoads typical business partners include data system providers, cleaners and business partners used while traveling. Due to the nature of the services they provide to Saferoad, saferoad



will only have a direct relationship to the potential risks within the industry, except for extraordinary events.

The risks that exist within these industries are primarily risks of poor working conditions, including long working hours, low pay and social dumping. Saferoad considered these risks to be followed up on and covered by the companies' practice on the Norwegian "påse-plikt", which requires all companies who hire or sub-contract services from sectors who have generally applicable collective agreements. They are also considering implementing a common framework agreement for hotels and travel services which will hopefully ensure that they only use services of those who ensure decent working conditions and give them a greater chance at exerting influence over the suppliers.

## Actual adverse impacts

Saferoad has not identified any actual adverse impacts while conducting this year's human rights and decent working conditions due diligence. Saferoad is aware that this does not mean there are no actual adverse impacts, it's just that these have not been possible to identify with the current measures and structures in place.

As this is the first year with reporting in accordance with the Norwegian Transparency Act a large part of the due diligence procedure has been to identify gaps and put a robust and efficient structure in place that will allow Saferoad to easily identify and rectify any actual adverse impacts.

Saferoad has also implemented an action plan to handle any adverse impacts that are identified and reported. Which includes rectifying any adverse impact that they have caused or contributed to with swift and proportionate compensation.

## Grievance mechanisms/Whistleblower channel

### **Grievance mechanisms/Whistleblower channel**

Saferoad has grievance mechanisms and a whistleblower channel available internally for its own employees, business associates and third parties. As mentioned in the section above, they will be implementing a whistleblowing channel and a grievance mechanism for adverse impacts identified in their supply chain within the coming year to ensure they can be directly notified of adverse impacts in their value chain.

## Our responsible path into the future

### **The way forward**

Draft a milestone plan with activities/initiatives, person responsible and deadline - explaining your plan for this continuous work

### **Our responsibilities**

Saferoad's goal is to be a leading enterprise within sustainability and ESG. ESG covers a myriad of topics, all very important, and to ensure that Saferoad contributes to the long lasting transition to a sustainable economy we plan to implement structural and forward thinking measures. The transition to a sustainable economy can not be done overnight, and Saferoad will therefore work strategically over the next few years to ensure material and useful change. This means structural changes internally, specifically regarding how we implement ESG within Saferoads companies, but also higher demands to our suppliers in regards to respecting human rights and sharing information about their value chain.

See more information about our values and expectations in our Code of Conduct and Supplier Code of Conduct [here](#).

### **Internal measures**

- **Internal training of key positions (e.g., Saferoad Procurement Network)**
- **Additional resources allocated to ESG**
- **Clear dialogue on values and risk acceptance from management**
- **Common framework agreement for travel**

### **External measures**

- **Risk assessment of key suppliers (annually)**
- **Refining Supplier questionnaire**
- **Review and update the current procurement practice**
- **Implement human rights and decent working condition audits**

By implementing both internal and external measure Saferoads expects to get a clear and detailed understanding of the risks of adverse impacts that exist in their value chain, and as a result, will be able to implement proficient and well functioning measures that mitigate the risk for adverse impacts and potentially contribute to an improvement of the working conditions across their value chain.

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