

# Transparency Act Report 2024

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## 1 Introduction

This due diligence assessment is made available to the public to meet the requirements of the Transparency Act. In the following sections, you will find the information that the law requires companies to make publicly available:

- Multiconsult's structure, business areas, and governing documents for handling potential adverse impacts on human rights and working conditions
- Information about potential adverse impacts and significant risks that Multiconsult has identified through our due diligence
- Information about Multiconsult's current measures and planned implementations, including some assumptions about the expected results of these new measures

### 1.1 Scope of this Due Diligence Assessment

This Due Diligence Assessment is developed to meet the reporting requirements of the following companies:

- Multiconsult ASA
- Multiconsult Norge AS
- LINK Arkitektur Norge AS
- A-lab AS

Other Norwegian companies that became part of Multiconsult Norge AS from January 1, 2023, onwards are Roar Jørgensen AS, Planteknikk AS, and T-2 Prosjekt Vest AS. As of January 1, 2024, these companies have become part of Multiconsult Norge AS, i.e., these companies will not be described as separate entities but will form part of Multiconsult Norge.

## 2 Multiconsult's structure, business areas and governing documents

Multiconsult publishes an [annual report](#)<sup>1</sup> yearly, with the latest one released in March 2024. The annual report is a comprehensive overview of Multiconsult's financial and operational performance for the last reporting year. In addition to a financial statement and highlights, it also provides a detailed overview of Multiconsult's business, risk factors, corporate governance, and sustainability. The chapters describing our business, corporate governance, and sustainability meet the requirements of the Transparency Act with respect to structure, business areas, and listing of governing documents for ensuring the protection of human rights and workers' rights.

### 2.1 Multiconsult's company structure, our operations, services and products offered to the market

For more detailed information about Multiconsult's reporting structure and business areas, please refer to pages 9-11 of the annual report for high-level information, and pages 25-26 for more in-depth details. For an even more comprehensive description of the structure and business areas, see page 151 and Note 5 – *Segments* in the annual report. These sections also contain information about the markets we operate in, the types of services and products we deliver, and the market outlook for each business area going forward.

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<sup>1</sup> [https://www.multiconsultgroup.com/assets/Multiconsult\\_Annual\\_report\\_2023.pdf](https://www.multiconsultgroup.com/assets/Multiconsult_Annual_report_2023.pdf)

## **2.2 How governing documents ensures compliance in our operations with respect to laws and regulations**

In the *Sustainability and Corporate Responsibility* section of the Annual Report, starting on page 51, we have included information about our governing documents and the areas they regulate internally. These governing documents cover various areas, including human rights and employee working conditions.

On page 85 of the Annual Report, Multiconsult elaborates on how human rights and working conditions are governed and incorporated into our operations. Equal opportunities are described on pages 77 and 84. Health and safety, and the working environment are discussed on several pages, particularly on pages 73-74. Employee involvement and their rights to assembly and unionize are detailed on page 73. These sections of the Annual Report also cover worker participation in workplace decision-making and collective bargaining (page 77), fair wages (pages 78 and 85), benefits (page 135), pensions (page 137), and the employee ownership program (Note 9 on page 157).

Regarding mechanisms for reporting issues of concern for employees, suppliers, subcontractors, and other stakeholders, Multiconsult has several measures in place. These mechanisms are described on pages 85, 87, and 88 of the Annual Report.

For several decades, Multiconsult has been working on policy development to ensure our processes comply with laws, regulations, international standards, and other relevant requirements expected by internal and external stakeholders. Compliance with laws, regulations, and other relevant expectations concerning human rights and worker rights is part of this policy development.

## **3 Adverse impacts and significant risks that Multiconsult has identified through our due diligence**

Multiconsult, along with its subsidiaries, is a multinational company with projects running in more than 20 countries worldwide at any given time. To deliver our services and products, we rely not only on our own operations but also on a wide range of suppliers and subcontractors. Our value chain has been developed over years and consists of our operations (including our subsidiaries and their various business units), as well as suppliers and subcontractors.

### **3.1 Operations in constant development**

Our operations are constantly evolving through new hires, employee departures, and company acquisitions. Additionally, new suppliers and subcontractors are regularly added or discontinued. Employees and acquisitions undergo thorough scrutiny through their respective processes (recruitment and M&A processes). Similarly, new suppliers and subcontractors are evaluated on a risk-based approach. International partners are subjected to a more rigorous process that involves a business ethics risk assessment and screening for adverse media (integrity due diligence) before an agreement is signed.

### **3.2 Residual risks**

Despite good controls in our processes, Multiconsult is still exposed to certain risks. In the value chain for delivering project management, engineering, and architectural services, the procurement of transportation and hospitality services that our employees and subcontractors require is an area of concern. Additionally, there may be subcontractors and suppliers in Asian, African, Middle Eastern, and South American countries with activities in their value chains where violations of human rights and employee working conditions occur.

#### **3.2.1 Potential risks that we monitor**

As a business delivering services in Norway and other international countries, we are faced with several types of exposure that might result in violation of workers/human rights. Below we have disclosed information about issues that we have a focus on due to the nature of our business.

## Exposure to hazardous materials

Incident: Workers exposed to harmful chemicals or substances without adequate protection or training. Both own operation, suppliers and subcontractors use in various degree hazardous materials in their production process of products or services.

## Non-payment of wages

Incident: Workers not receiving their due wages on time or being underpaid.

Not receiving or being underpaid for delivered work is a less common issue in certain parts of the world like Norway. However, with the multiple number of suppliers and subcontractors that Multiconsult use, it might be that this may have occurred.

## Forced overtime

Incident: Workers being forced to work overtime without proper compensation or rest.

Violation of laws regulating working hours is not uncommon in the world. Also, in the Nordic countries. Multiconsult and its subsidiaries have not reported violation of the law in 2023.

## Lack of rest and breaks

Incident: Workers not being given legally mandated breaks or rest periods.

Violating labor laws that ensure workers have adequate rest and break times is not uncommon in the world. Also, in the Nordic countries. Multiconsult and its subsidiaries have not reported violation of the law in 2023.

## Discrimination

Incident: Workers facing discrimination based on race, gender, religion, or other characteristics.

Failing to provide equal treatment and opportunities, violating anti-discrimination laws and workers' rights is not uncommon also in the Nordic countries. Multiconsult and its subsidiaries have not reported violation of the law in 2023.

## Retaliation against whistleblowers

Incident: Workers facing retaliation for reporting unsafe conditions or unethical practices.

The breaching protections for whistleblowers, which is essential for upholding workers' rights. Multiconsult and its subsidiaries have not reported any such violations during 2023.

As a business delivering services in Norway and other international countries, we are exposed to several types of risks that might result in violations of workers' and human rights. Below, we have disclosed information about issues that we focus on due to the nature of our business.

## 3.3 Actual violations of human rights and working conditions

Throughout 2023, there have been some, but not many, issues related to the violation of workers' and human rights. The incidents are of an ad-hoc nature and not systematic, which indicates that there is no consistent violation of workers' and human rights in our value chain.

### 3.3.1 Actual incidents during 2023

#### Workplace accidents and incidents

Incident: Workers getting injured due to unsafe working conditions, lack of proper safety equipment, or inadequate training.

Violation: Failing to provide a safe and healthy working environment, which is a fundamental workers' right.

Multiconsult and its subsidiaries have had incidents during 2023. Figures for this can be found on page 76, under *Absence due to work-related accidents or incidents*, in our Annual Report.

Multiconsult has not received direct information from our suppliers or subcontractors about their violations of workers' and human rights concerning workplace accidents and incidents. However, such information is available from those suppliers that publicly disclose their annual reports.

## Harassment and abuse

Incident: Physical, verbal, or sexual harassment or abuse in the workplace.

With a combined workforce in Norway of about 3,000 employees (Multiconsult Norge, LINK Arkitektur, and A-Lab), there is always a risk of harassment in the workplace. Similarly, our suppliers and subcontractors face equal challenges when their employees interact daily.

Multiconsult and its subsidiaries have had incidents during 2023. Figures for this can be found on page 84, under *Human Rights Impact*, in our Annual Report.

## 4 Existing and planned measures

### 4.1 Measures in place

**Governing Documents:** Multiconsult has policies, procedures, and other relevant guidance in place to ensure what we require from employees internally and what we expect from our suppliers and subcontractors. Examples include Multiconsult's code of conduct and health and safety policy, which explicitly prohibits human rights abuses and worker exploitation and establishes clear expectations for our employees. We have further requirements in our contract templates and procurement policies, where we explicitly require business partners to uphold the same standards in their operations.

**Barriers/Risk Reducing Measures/Controls:** Multiconsult assesses our operations to identify areas with unwanted levels of risk. In these areas, we ensure that barriers, risk-reducing measures, and controls work according to design to avoid unwanted incidents. If barriers, risk-reducing measures, or controls are not working as intended or are non-existent, actions are taken to address these issues.

**Training:** Multiconsult has measures in place to educate all parts of the value chain, from our suppliers and own operations to subcontractors. These measures have been in operation for more than a decade.

**Co-operation with partners:** Ongoing cooperation with suppliers and subcontractors serves as an effective measure to ensure compliance with Multiconsult's requirements, laws, and regulations.

**Reporting:** Our employees know what is expected of them, and should any violations occur, reporting is mandatory according to our policy. Multiconsult has several mechanisms for workers and communities to raise complaints or grievances related to human rights abuses or violations of workers' rights. These mechanisms are transparent and accessible, ensuring that complaints are investigated and addressed appropriately. For example, Multiconsult's Whistleblower portal is one of several grievance mechanisms available to both external and internal stakeholders.

**Monitoring:** Multiconsult monitors our own operations on an ongoing basis. In addition, we monitor suppliers and subcontractors at a high level. The monitoring is currently risk-based, with a key focus on international suppliers and subcontractors. A high percentage of suppliers and subcontractors in Asian, African, Middle Eastern, and South American countries that we use in our operations are partners we have worked with for several years. They are all included in our monitoring system for conducting Integrity Due Diligence (IDD).

**Audits:** Our internal audit function conducts yearly audits of suppliers and subcontractors vital to our operations and the services we deliver to our clients. These risk-based audits focus on areas such as human rights and working environment conditions to identify and assess potential risks to human and workers' rights in our operations and supply chains.

**Collaborative efforts:** Multiconsult collaborates with industry NGOs like RIF (Norway) and unions like TEKNA and NITO to promote respect for human rights and workers' rights in our value chain. These collaborative efforts include best practices, participating in multi-stakeholder initiatives, and engaging in dialogue.

**Transparency and external reporting:** Multiconsult demonstrates transparency by publicly reporting on our human rights and workers' rights practices, including the steps we are taking to address identified risks and any incidents of potential violations.

#### 4.2 Planned measures

Multiconsult and its subsidiaries have several planned measures in place, both short-term and long-term. Multiconsult will be focusing particularly on its training and monitoring measures. There are also plans to revise key governing documents and improve our transparency and external reporting.

#### 4.3 Efficiency and quality of existing measures

Multiconsult has successfully developed its operations while establishing strong cooperation with suppliers and subcontractors. Our consistent approach, especially with regard to the controls we have implemented, has ensured steady business growth without unwanted incidents. These measures have proven particularly effective in countries with higher risks of human rights violations and poor working conditions, highlighting the robustness of our controls.

#### 4.4 Expected results of planned measures

Like our competitors and other entities in the market, Multiconsult needs to continue to develop the processes that form our value chain.

Presently, Multiconsult is comfortable with the level of risks in the value chain concerning potential violations of human rights and breaches of employee working conditions. The measures we plan to implement in the short term and long term will further improve our internal control system within our value chain. These improvements will reduce the likelihood of unwanted incidents related to violations of human rights and employee working conditions.

The board and CEO of Multiconsult ASA  
Oslo, 19 June 2024



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Rikard Appelgren

Chair of the board



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Hanne Rønneberg

Director



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Tove Raanes

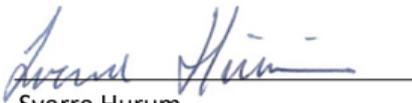
Director



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Tore Sjørøen

Director



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Sverre Hurum

Director



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Gunnar Vatnar

Director



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Torben Wedervang

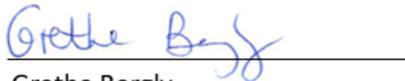
Director



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Karine Gjersø

Director



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Grethe Bergly

CEO