

Statement Norwegian Transparency Act for Multiconsult Group – 2024

1 Introduction and purpose

This report has been prepared in accordance with Section 5 of the Norwegian Transparency Act (Åpenhetsloven). It describes how Multiconsult Group works to respect fundamental human rights and decent working conditions in our own operations, among our suppliers, and throughout our business relationships. The report provides a summary of our due diligence assessments and describes actual and potential risks of adverse impacts, as well as the measures we have implemented to prevent or mitigate such risks.

Multiconsult Group considers respect for human and labour rights to be an integral part of responsible business conduct. This approach is embedded in our group wide compliance and governance framework and supports our ambition to contribute to sustainable development wherever we operate. The report applies to Multiconsult ASA and its consolidated subsidiaries.

2 Reporting entities and legal obligations

This statement covers Multiconsult ASA and its subsidiaries that are subject to the Transparency Act as larger enterprises domiciled in Norway. These include, but are not limited to:

- Multiconsult Norge AS
- LINK Arkitektur AS
- A-Lab AS
- Sitepartner AS

The Multiconsult Group also includes several subsidiaries outside the scope of the Norwegian Transparency Act, such as:

- LINK Arkitektur AB (Sweden)
- LINK Arkitektur A/S (Denmark)
- Multiconsult Polska Sp. z o.o. (Poland)
- Iterio AB (Sweden)

Although these companies are not directly subject to the Norwegian Transparency Act, they are expected to align with the Multiconsult Group's overall approach to respecting human rights and promoting decent working conditions, in line with the group's ethical standards and policies.

3 Governance and Responsibility

Oversight of the group's compliance with the Transparency Act is the responsibility of the Board of Directors of Multiconsult ASA. The group's Executive Management Team ensures the operational follow-up, and the compliance function coordinates the due diligence process.

Our efforts to prevent, identify, and address adverse impacts on human rights and working conditions are integrated into the group's overall risk management framework. The activities are aligned with international standards, including:

- The OECD Guidelines for Multinational Enterprises
- The UN Guiding Principles on Business and Human Rights
- The ILO Core Conventions
- The UN Global Compact

Policies and procedures supporting this work include, but are not limited to:

- [Code of Conduct](#)
- [Business Partner Declaration](#)
- [Sustainability Policy](#)
- [Procurement Policy](#)
- [Whistleblower Policy](#)

All group entities are expected to operate in accordance with these policies and to embed human rights due diligence into their operations and relationships.

4 Organisational structure and business model

Multiconsult Group is a publicly listed Norwegian engineering and architectural consultancy with more than 3,900 employees across 80+ offices primarily in Norway but also in Scandinavia, Poland, the UK, Portugal, Serbia, and several African countries. We deliver advisory and design services across buildings, infrastructure, energy, water and environmental projects, with emphasis on sustainability and innovation.

Our services are delivered through a combination of in-house expertise and subcontracted support. We also engage in partnerships and joint ventures, where clear contractual frameworks govern risk sharing and ethical expectations. A comprehensive overview of our group structure, operations and strategy is available in our [Annual Report 2024](#).

5 Approach to human rights due diligence

Multiconsult Group's approach to managing human and labour rights risk is structured around the following pillars:

- Governance and commitment – ensuring board-level oversight and clear responsibility across the organisation.
- Identification of potential and actual adverse impacts, using risk-based assessments across business units, regions, and suppliers.
- Prevention and mitigation of adverse impacts, embedding contractual safeguards, conducting partner due diligence, and requiring corrective actions where needed.

- Monitoring and follow-up, using audits, training, and feedback mechanisms to measure effectiveness.
- Remediation; where Multiconsult Group contributes to or is directly linked to adverse impacts, appropriate remediation actions are taken, in line with international standards.

This approach is consistent with the OECD Due Diligence Guidance for Responsible Business Conduct and supports Multiconsult Group's long-standing commitment to integrity and sustainability.

6 Activities to identify negative impacts on human rights

6.1 Risk assessment

Multiconsult Group performs risk-based assessments to identify potential impacts on human rights across its operations and supply chain. While the company's direct operations in Norway, Scandinavia and Poland present a relatively low risk of violations of human rights, international operations and suppliers located in higher-risk geographies require additional scrutiny. These risks include, but are not limited to:

- Exposure to forced, bonded or child labour
- Poor working conditions or non-payment of wages
- Excessive or forced overtime
- Inadequate occupational health and safety measures

Key risk indicators are evaluated in line with the principles outlined in the International Bill of Human Rights, particularly:

- The right not to be subjected to slavery, servitude or forced labour
- The right to just and favourable working conditions

The right to the highest attainable standard of health and to a safe and healthy working environment

6.2 Integrity due diligence (IDD)

Multiconsult Group conducts integrity due diligence on clients, suppliers, and other business partners such as subcontractors, joint venture participants, and consortium members. For international engagements and projects in countries with elevated risk profiles, additional reviews are performed through business ethics screening and adverse media monitoring. This includes assessments regarding:

- Corruption and bribery
- Human rights violations
- Non-compliance with sanctions

- Environmental and safety standards
- Other economic crimes or reputational risks

The IDD framework supports informed decisions about whether a partner meets Multiconsult Group's compliance standards. These reviews are supported by our Business Partner Declaration.

6.3 Country and sectoral risk mapping

Multiconsult Group uses publicly available human rights indices, internal assessments, and market intelligence to prioritise attention to suppliers and subcontractors in higher-risk countries. These typically include countries in Asia, Africa, and Latin America. Specific risk factors include:

- Lack of transparency regarding labour practices among lower-tier suppliers
- Local enforcement gaps on working hour restrictions or wage protection
- Risks linked to security services, logistics, construction, or offshore work environments

6.4 Project risk evaluation

Projects in post-conflict zones or those involving sensitive infrastructure (e.g. energy transmission, defense) are subject to heightened evaluation. Partner compliance capacity, stakeholder mapping, and country risk ratings are integrated into pre-approval and contract stages.

6.5 Summary

Although no serious human rights violations were identified in Multiconsult Group's direct operations in 2024, risk remains in parts of the international supply chain. Multiconsult Group continues to monitor these areas closely and applies targeted mitigation measures through training, contract management and supplier engagement.

7 Activities to prevent and mitigate negative human rights impacts

Multiconsult Group implements measures to prevent and mitigate adverse human rights impacts across its operations and supply chain. These actions are expected to deliver positive outcomes over the short, medium, and long term, depending on context and maturity of the relationship. Due diligence and supplier follow-up contribute to continuous improvement, increased awareness, and a more responsible value chain.

7.1 Cascading expectations through the supply chain

Multiconsult Group expects its suppliers and subcontractors to uphold the same high standards for human rights, health and safety, and business integrity as the group applies internally. These

expectations are formalised through the Business Partner Declaration, which all suppliers are required to sign. This declaration commits suppliers to uphold:

- Fundamental human and labour rights
- Environmental responsibility
- Anti-corruption and ethical business practices

Requirements are reinforced through procurement procedures, onboarding practices, and standard contractual clauses that reference human rights compliance, audit rights, and consequences for breaches.

7.2 Contractual provisions and audit rights

Contractual clauses serve as a formal mechanism to ensure that suppliers adhere to Multiconsult Group's human rights expectations. These contracts often include:

- Audit rights enabling verification of compliance
- Clauses for remediation or contract termination in case of violations
- Provisions requiring cascading obligations to sub-suppliers

7.3 Supplier monitoring, reviews, and audits

Multiconsult Group performs periodic risk-based supplier assessments, which may include documentation reviews, supplier self-assessments, and follow-up interviews. In 2024, reviews of selected suppliers in higher-risk geographies helped verify working conditions and documentation of wages, hours and occupational health and safety.

Field visits were conducted in projects, either directly or in collaboration with clients and local partners. These visits provided insight into subcontractor conditions and were used to strengthen local compliance and awareness.

7.4 Whistleblowing and grievance mechanisms

Multiconsult Group provides a secure Whistleblower Portal available to internal and external stakeholders, allowing anonymous reporting of concerns related to human rights, ethics, or other misconduct. All reports are handled confidentially by the compliance function, and the company enforces a strict non-retaliation policy.

Reports concerning human rights are investigated promptly, and if violations are identified, corrective actions are implemented. The whistleblower procedure is described on our website and in internal governing documents.

7.5 Capacity building and supplier engagement

Multiconsult Group has a pragmatic and risk-based approach to capacity building on human rights and decent working conditions. Given the relatively low inherent risk in our supply chain, these topics are addressed where relevant, rather than through general awareness campaigns.

In ongoing projects, our project managers and project team members, regularly engage with suppliers and subcontractors, especially in international contexts, to clarify expectations related to labour practices, occupational health and safety, and compliance with contractual terms. These conversations typically take place prior to contract mobilisation and reflect the values expressed in our Code of Conduct and Business Partner Declaration.

Internally, the Multiconsult Group builds capacity on responsible business conduct through a combination of governing documents, digital and in-person training, and on-the-job learning. Key elements of the Transparency Act and responsible supply chain practices are introduced in onboarding for relevant personnel and addressed in procurement and project processes where relevant. While training is not yet systematically tailored to different risk profiles, employees working in procurement or international projects are more frequently exposed to guidance and dialogue on risk identification and risk management, including risks related to human rights and decent working conditions. The Group aims to further strengthen and structure this work going forward.

Multiconsult Group continues to participate in industry forums and collaborative initiatives focused on sustainability, ethical supply chains, and responsible business conduct, building on a long-standing position as a value-driven organisation with strong support from owners and employees for ethical business practices.

7.6 Remediation and corrective actions

Multiconsult Group did not encounter situations in 2024 that required formal remediation for human rights violations or breaches of decent working conditions. This outcome reflects the group's long-standing preventive approach, where risks are assessed early in project development, client selection, and supplier onboarding.

Rather than relying on retrospective correction, Multiconsult Group emphasises forward-looking risk management through screening, integrity due diligence, and strategic decisions about where and with whom we operate. This includes a careful evaluation of suppliers' practices and project contexts, particularly in higher-risk geographies.

The group maintains readiness to address potential breaches if they arise. This includes contractual mechanisms, escalation procedures, and expectations for dialogue and improvement with business partners. Internal guidance on remediation principles is being further developed as part of our ongoing maturity process, ensuring that should adverse impacts occur, responses are prompt, appropriate, and aligned with international standards.

8 Priorities for the human rights program going forward

Multiconsult Group's commitment to respecting human rights and promoting decent working conditions is a continuous journey. This journey started more than two decades ago and has as a result established a robust framework for human rights due diligence, raising awareness internally, and improving supplier oversight. As our business continues to grow both geographically and operationally, the maturity of our human rights program must develop in parallel.

Looking ahead to 2025 and beyond, Multiconsult Group will further strengthen its human rights efforts in line with international standards and stakeholder expectations. The following priorities have been defined for the coming period:

- Deepen integration of human rights in procurement and project governance: Ensure that human rights assessments are systematically included in supplier selection, contracting, and project planning, particularly in high-risk sectors and geographies.
- Expand training and awareness across business units: Deliver targeted training for project managers, procurement personnel, and international teams on responsible business conduct and the Transparency Act. Include lessons learned from recent supplier reviews and whistleblower cases.
- Update salient issue mapping and risk models: Conduct a refreshed assessment of salient human rights risks linked to Multiconsult Group's evolving project portfolio and international footprint. This includes considering developments in the renewable energy sector, infrastructure partnerships, and fragile state contexts.
- Increase risk-based supplier audits and follow-up mechanisms: Operationalise a new supplier follow-up plan that includes on-site or virtual audits, with a focus on subcontractors in construction, logistics, and international field services.
- Strengthen collaboration with clients and partners: Work more closely with public and private clients, joint venture partners, and framework agreement consortia to align expectations and build a shared platform for responsible supply chains.
- Evaluate remediation and grievance mechanisms: Review the effectiveness of current whistleblowing and incident follow-up processes, including feedback loops to suppliers and local teams. Develop guidance on remediation principles for human rights breaches.

These priorities reflect Multiconsult Group's long-term ambition to be a trusted partner in sustainable development and responsible business. As expectations evolve, our commitment remains clear: to prevent harm to people, promote ethical value chains, and build transparency through action.

The board of directors

Multiconsult ASA

Oslo, 17 June 2025



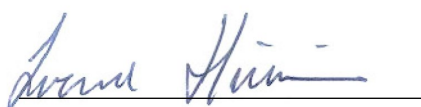
Rikard Appelgren

Chair of the board



Tove Raanes

Director



Sverre Hurum

Director



Trude Skogesal

Director



Grethe Bergly

CEO



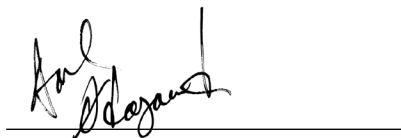
Eva Kristensen

Director



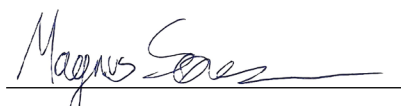
Tore Sjursen

Director



Axel Ødegaard

Director



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