

STATEMENT ON DUE DILIGENCE ASSESSMENTS

NORCE Research AS

The statement covers the period 01.01.2025-31.12.2025

Introduction

The Norwegian Transparency Act (“Åpenhetsloven”; LOV-2021-06-18-99) (the “Transparency Act”) entered into force on 1 July 2022. The Transparency Act seeks to promote companies’ respect for fundamental human rights and the provision of decent working conditions in connection with the production of goods and the provision of services. Furthermore, it is designed to ensure public access to information concerning how enterprises assess and address actual and potential adverse impacts in these areas.

Companies subject to the Transparency Act shall publish an annual statement on their due diligence assessments by 30 June each year, cf. section 5 of the act. In addition, companies are obliged to respond to external requests for information on how adverse impacts are addressed, based on the published assessments. The Norwegian Consumer Authority is responsible for supervising compliance with the reporting and information obligations.

NORCE Research AS (“NORCE”) is subject to the Transparency Act and is committed to a systematic approach to identifying, assessing and addressing actual and potential adverse impacts on human rights and decent working conditions. This commitment extends to NORCE’s own operations, its supply chain, and its collaboration partners. NORCE carries out due diligence in accordance with the Transparency Act and implements appropriate measures as necessary to ensure compliance.

Organisation, operations and activities

NORCE is currently undergoing a comprehensive transformation, through which the organisation is being further developed to be best positioned to meet future needs in society and the research sector. Under the programme “Future NORCE”, the organisation, structures and working methods are being further developed to ensure continued high quality, sustainable operations and robust framework conditions for research with clear value for society and industry. The objective is to provide NORCE with an even stronger foundation for value creation, collaboration, and societal contribution. The changes are scheduled to be implemented and fully operationalised in the second half of 2026. Accordingly, the company description below is based on the organisational structure as of 2025, prior to the implementation of the change programme.

NORCE is one of Norway’s largest independent research institutes, headquartered in Bergen, with approximately 750 employees across nine cities in Norway. The institute conducts research, development and innovation in collaboration with the public and private sectors,

supporting informed and sustainable decision-making. Our research spans energy, technology, climate, environment, health and society, and our academic communities are recognised both nationally and internationally.

Our aim is to contribute to addressing major societal challenges, including climate change, the energy transition, population ageing, social inequality and youth exclusion. To strengthen our ability to set a clear direction and develop targeted strategies, we have consolidated cross-disciplinary expertise into four strategic focus areas: (1) Safe and Good Societies, (2) Energy of the Future, (3) Climate and Environmental Risk, and (4) Sustainable Seas and Coasts.

NORCE, together with its three subsidiaries, constitutes a group under the holding company NORCE Holding AS. The principal owners of NORCE, through NORCE Holding AS, are the universities of Bergen, Stavanger, Agder and Tromsø, either as direct shareholders or through regional holding companies. Taken together, these entities represent 95.9% of the shareholding. The remaining owners comprise county authorities, municipalities, research foundations and companies within industry and finance.

NORCE's research activities are organised into three divisions: Health and Society, Climate and Environment, and Energy and Technology. Each division is headed by an executive vice president. Most administrative staff are organised within a shared support function under the divisions of Finance and Organisation. For further information about NORCE, please refer to our website: <https://www.norceresearch.no/>.

NORCE has three subsidiaries. Each subsidiary prepares its own statement, which is published on the subsidiary's website:

Nasjonalt kunnskapssenter om vold og traumatisk stress AS (NKVTS)

The company is 100% owned by NORCE and develops and disseminates knowledge and competence relating to violence and traumatic stress. Its purpose is to help prevent and reduce the health-related and social consequences that violence and traumatic stress may entail.

Website: <https://www.nkvts.no/om-oss/etikk-samfunnsansvar/>

Nasjonalt utviklingssenter for barn og unge AS (NUBU)

The company is 100% owned by NORCE and contributes to ensuring that children and young people with severe behavioural problems – as well as their families, kindergartens and schools - receive research-based, relevant, individually tailored and effective support. Website:

<https://www.nubu.no/no>

Nordisk institutt for odontologiske materialer AS (NIOM)

The company is owned 51% by NORCE and 49% by the Ministry of Health and Care Services, and contributes to ensuring safe and well-functioning biomaterials for the Nordic population.

Website: <https://www.niom.no/about-niom/strategy-reports-and-cooperation>

Our services

Society faces complex challenges that require responsible and knowledge-based development. NORCE provides research and services that support sustainable and well-informed decision-making in both the public and private sectors.

As an independent research institution with a broad societal mandate, NORCE brings together interdisciplinary expertise with advanced laboratories and modern research infrastructure. This provides a robust basis for developing, testing and implementing new solutions in close cooperation with our customers and collaboration partners.

NORCE operates key research infrastructure facilities - including laboratories, test centres and technology parks - that are central to the development and testing of new solutions. Examples include Ullrigg, an advanced drilling technology test facility in Stavanger, and the NORCE Technology Park Risavika, which facilitates the scaling of green technologies in biotechnology, the circular bioeconomy and carbon capture and utilisation (CCU). On behalf of public authorities, NORCE is also responsible for four national knowledge and competence centres within health, conducting research and contributing to the development of public services.

NORCE conducts research and innovation projects for public-sector bodies, industry, and international organisations. With more than one thousand active projects, our work is financed through a combination of public funding, research councils, EU programmes and private sector actors.

Values and responsibility

NORCE attaches great importance to acting responsibly and with integrity across all its activities. A safe, inclusive and professional working environment is essential to delivering high-quality research while fulfilling our broad societal mandate. Accordingly, we work systematically to prevent circumstances that may result in human rights violations or unacceptable working conditions – both internally and in cooperation with external parties.

As an ISO 45001-certified organisation, NORCE has established systems for the management of health, safety and the working environment, which are regularly evaluated and improved. This work encompasses both physical safety, and a sound psychosocial working environment, as well as initiatives relating to equality and diversity. These efforts are carried out in close cooperation with safety representatives and employee representatives. The overall objective is fostering a workplace characterised by respect, openness and predictability.

NORCE also sets clear expectations for its collaboration partners and suppliers. These requirements are set out in governing documents that establish the framework for responsible operations and ethically grounded decision-making, including:

- Code of Conduct and Research Ethics Guidelines
- Supplier Code of Conduct
- HSE, Quality and Security Policy
- Contract Policy
- Procurement Policy
- Policy for Responsible International Knowledge Cooperation

Through these principles, NORCE works systematically to fulfil its corporate social responsibility. This includes preventing adverse impacts and setting a clear expectation that all parties representing or collaborating with NORCE uphold the same standards.

Due diligence assessments

Procurement

NORCE conducts procurement across a wide range of goods and service categories. The 30 largest suppliers account for more than half of the total procurement value, and the deliveries mainly relate to premises, pension schemes and ICT. Other procurement largely consists of consultancy and service purchases, as well as equipment and consumables. The majority of the suppliers are Norwegian, which is considered to imply a relatively low risk profile related to human rights and working conditions.

As an entity subject to the Public Procurement Act, NORCE performs risk-based assessments as an integral part of its procurement processes, including assessments against DFØ's ("Norwegian Agency for Public and Financial Management") high-risk list. The procurement function is centralised and follows established procedures and routines. This includes setting relevant requirements related to the safeguarding of human rights and decent working conditions in both tender documents and contracts.

Within ICT, which DFØ classifies as a high-risk area, NORCE largely uses framework agreements provided by SIKT (a government agency under the Ministry of Education and Research). Based on available information, NORCE assumes that SIKT carries out procurement and supplier follow-up in accordance with relevant regulations and the requirements of the Transparency Act. Publicly available information is published on SIKT's website.

Low-value purchases

For low-value purchases of goods and services, NORCE uses a wide range of various suppliers. To ensure a more systematic and consistent approach to such purchases, a dedicated purchasing function with allocated resources has been established. A key part of this responsibility is to obtain self-declarations from suppliers and carry out risk-based background checks also for this type of supplier relationship. This provides improved oversight, reduced risk and a more holistic approach to responsible purchasing.

Collaboration partners

NORCE collaborates with a range of partners in research and development projects, often funded by the Research Council of Norway, the EU, ministries, county authorities or municipalities. Collaboration partners are assessed under an overarching risk classification. Norwegian partners are generally considered to involve relatively low risk, while collaboration with partners in countries or sectors with elevated risk triggers a more thorough assessment and approval process. NORCE has established procedures to ensure that these assessments are carried out in line with the requirements of the Transparency Act. In 2025, the volume from Norwegian partners accounted for approximately 85% of the collaboration portfolio. The foreign share of 15% mainly comes from partners in the EU, the United Kingdom and the United States.

Mapping and identification of risk

During the period covered by this report, no actual adverse impacts related to human rights or decent working conditions have been identified. Based on assessments of suppliers and collaboration partners, the risk of such breaches is considered relatively low for the majority of

NORCE's activities. At the same time, certain supplier and collaboration relationships have been identified where there is a need for more insight into how human rights and working conditions are safeguarded. These are followed up on an ongoing basis, and monitoring and any measures form part of continuous follow-up.

Any violations of human rights shall be recorded and handled as non-conformities in NORCE's management system. NORCE has established a due diligence committee which, when needed, provides support in assessments. The committee reviews non-conformities reported on a quarterly basis, reports relevant findings to the executive management and informs the communications department to ensure updated information about the work on the company's website.

NORCE considers clear guidelines and sufficient resources to be essential for preventing and reducing the risk of adverse impacts.

Chief Executive Officer Camilla Stoltenberg has the overall responsibility for compliance with the Transparency Act.

Enquiries regarding the Transparency Act and the duty to provide information may be addressed to EVP and General Counsel Helge Tennebø (hete@norce-research.no).

This report is published on NORCE's website.

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