

List of Signatures

Page 1/1

**NORCE RedegjørelseÅpenhetsloven_2024_EN.pdf**

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ACCOUNT OF DUE DILIGENCE ASSESSMENTS

NORCE Norwegian Research Centre AS

The report applies to the period 01.01.2024-31.12.2024

Introduction

The Transparency Act (LOV-2021-06-18-99) entered into force on 1 July 2022 and aims to promote companies' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services. The act is also intended to ensure that the public has access to information about how companies deal with actual and potential negative consequences in these areas.

All enterprises covered by the Transparency Act are obliged to publish an account of their due diligence assessments by 30 June each year, cf. Section 5 of the Act. Furthermore, the company shall respond to external inquiries about how it handles any negative consequences related to the assessments that have been published. The Consumer Authority (Forbrukertilsynet) is responsible for following up the reporting and information obligation.

NORCE Norwegian Research Centre AS (NORCE) is subject to the Transparency Act and undertakes to work actively to identify, assess and deal with possible negative impacts on fundamental human rights and decent working conditions. This applies both internally in the company, in our supply chain and with our partners. We will carry out due diligence assessments in line with the requirements of the law and implement measures where necessary.

General description of the corporation and its operation

NORCE is one of Norway's largest independent research institutes, headquartered in Bergen and with over 800 employees in 10 cities throughout the country. We deliver research, development and innovation in close collaboration with both the public and private sectors, to lay the foundation for wise and sustainable decisions for the future.

Our goal is to contribute to solving major societal challenges such as climate change, energy transition, the ageing population, social inequality and youth exclusion. Therefore, we have gathered our expertise across disciplines in four different focus areas, so that we can more easily make clear strategies around the specific challenges. These four areas are (1) Safe and good societies, (2) Future energy, (3) Climate and environmental risk and (4) Sustainable oceans and coasts.

NORCE with its three subsidiaries is a corporation under the holding company NORCE Holding AS. The major owners of NORCE through NORCE Holding AS are the universities of Bergen, Stavanger, Agder and Tromsø, either as direct owners or through regional holding companies. These make up a total of 95.9% of the shareholders. Other owners include county councils, municipalities, research foundations and companies in industry and finance.



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The research activities in NORCE are divided into the three divisions Health and Social Sciences, Climate and Environment, and Energy and Technology. Each division is headed by an executive vice president. In addition, there is an appointed executive vice president for Commercialization, who is responsible for bringing research results to the market. The administration is organized as a central staff function within the divisions of Finance and Organization. For more information on NORCE, please refer to our website <https://www.norceresearch.no/en/>.

NORCE has three subsidiaries. The subsidiaries prepare their own statements on due diligence assessment, which are published on their respective websites;

Nasjonalt kunnskapssenter om vold og traumatisk stress AS (NKVTS)

The company is 100% owned by NORCE. Develops and disseminates knowledge and expertise about violence and traumatic stress. The purpose is to help prevent and reduce the health and social consequences that violence and traumatic stress can cause. <https://www.nkvts.no/om-oss/etikk-samfunnsansvar/>

Nasjonalt utviklingssenter for barn og unge A (NUBU)

The company is 100% owned by NORCE. Contributes to ensuring that children and young people with serious behavioral problems, their families, kindergartens and schools receive help that is research-based, relevant, individually adapted and effective. <https://www.nubu.no/om-oss/category7.html>

Nordisk institutt for odontologiske materialer AS (NIOM)

The company is owned 51% by NORCE and 49% by the Ministry of Health and Care Services. Contributes to ensuring safe and well-functioning biomaterials for the Nordic population. <https://www.niom.no/governance.609401.en.html>

Our Services

Society is facing major challenges. NORCE has extensive experience in research, high expertise across disciplines and a range of laboratories and infrastructures. As an independent research institution with a 360-degree perspective, NORCE serves as a comprehensive advisor, providing the necessary insight to support wise and sustainable decisions for the future.

NORCE uses research infrastructure, including laboratories and test centers, which is crucial for the development and testing of new solutions. One example is Ullrigg, an advanced drilling technology test facility in Stavanger. Another example is NORCE Technology Park Risavika, where it is facilitated for the development and upscaling of green technology, especially in biotechnology, circular bioeconomy and carbon capture and utilization (CCU).

On behalf of the government, NORCE also operates four knowledge and competence centers within the health sector. Here we conduct research and develop public services, as well as offer advisory services, courses and continuing education.

NORCE's clients include public authorities, private companies, and international organizations. The funding comes from a combination of public sources, research councils, EU projects, and private entities. NORCE collaborates closely with universities, industry and the public sectors to ensure broad funding and support for its research projects. At any given time, we are engaged in over a thousand research and innovation projects in collaboration with national and international clients and partners.



Values and responsibilities

NORCE works systematically to ensure an inclusive, safe and supportive working environment for all employees. We are committed to ensuring that our activities do not infringe upon fundamental human rights both internally among staff and externally in our relationships with partners and suppliers.

NORCE is ISO 45001 certified and has established robust procedures to safeguard both the physical and psychosocial working environment. We have an action plan for equality and diversity and are working closely with employee representatives and safety delegates.

Our expectations of ourselves, our partners and our suppliers are embedded in a range of guidelines and policies, including but not limited to:

- Ethical guidelines and separate research ethics guidelines
- Supplier Code of Conduct
- HSE, quality and safety policy
- Contract policy
- Procurement policy
- Policy for responsible international knowledge collaboration

Through these principles, we ensure that NORCE operates in a responsible, sustainable and ethically responsible manner.

Due diligence assessments

Procurement

NORCE conducts procurements from a wide range of suppliers across various goods and service categories. The 30 largest suppliers account for over 57% of the company's total procurement value, primarily being within the categories of premises, pension costs and ICT. Other procurements largely include consultancy and service purchases, equipment and various consumables. Norwegian suppliers constitute the vast majority within these categories.

NORCE is subject to the Public Procurement Act and, as part of the procurement process, conducts risk-based assessments related to the type of procurement. This includes assessments against the Directorate for Financial Management (Direktoratet for forvaltning og økonomistyring-DFØ)'s high-risk list. Procurements are led by a central procurement function that ensures that the process is followed according to established guidelines, including the implementation of due diligence assessments during the contract period. Based on these assessments, relevant and proportionate requirements are set in tender documents and contracts to ensure that suppliers awarded contracts respect human rights and decent working conditions.

For ICT procurements, which is a category defined as high-risk in DFØ's high-risk classification, NORCE largely meets its needs through call-offs from framework agreements provided by SIKT. SIKT is a government administrative agency under the Ministry of Education and Research that develops, procures and delivers products and services for education and research. Based on the information



we have about SIKT, we assume that they conduct procurements and supplier follow-ups in a regulatory manner and within the due-diligence window of the guidelines and regulations that they are subject to, including the Transparency Act. Please refer to their web pages for their accounts of due diligence assessments <https://sikt.no/en/about-sikt>.

Smaller individual purchases

In addition to procurements covered by the Public Procurement Act, NORCE uses a significant number of suppliers for the purchase of goods and services of lower value. To systematize and streamline this type of purchasing, a purchasing function with dedicated resources has recently been established. The intention is that the purchasing function shall be responsible for conducting due diligence of these suppliers according to the Transparency Act.

Partners

As a leading research institute, NORCE collaborates with a variety of collaboration partners in research and development projects. These projects are often funded through the Research Council of Norway, EU funds, ministries, counties and municipalities. Partners are classified based on an overall risk assessment. Norwegian partners are generally considered to have a low risk of violating human rights and decent working conditions. For high-risk partners, a thorough risk-based approval process is conducted. The organization has implemented procedures in line with the Transparency Act to ensure proper assessments. In 2024, the proportion of Norwegian partners constituted the large majority. The remaining partners were mainly European, with a few from outside Europe.

Mapping and identification of risk

In our work with the Transparency Act, no actual negative consequences for fundamental human rights or decent working conditions have been uncovered during the period.

Based on the assessments made above in the section on due diligence assessments of suppliers and partners, the risk of violations of human rights and decent working conditions for the majority of cases is considered relatively low. However, based on risk classification, we have also identified suppliers and partners where there is a need to gain further insight into how they work with fundamental human rights and working conditions. Monitoring, follow-up and measures will be an on-going process.

If violations of human rights are uncovered, they shall be registered and treated as deviations in NORCE's management system.

NORCE has established a due diligence committee to assist with due diligence assessments when needed. The committee reviews reported deviations on a quarterly basis and reports any findings to the corporate management. The committee also keeps the communications department updated so to ensure that NORCE's website is updated.



NORCE believes that clear guidelines and sufficient resources for implemented processes are crucial to limiting the risk of negative consequences.

CEO Camilla Stoltenberg has the overall responsibility for ensuring that the law is followed.

Inquiries about the duty of information and the Transparency Act shall be directed to Helge Tennebø by e-mail hete@norce-research.no. This report is published on our website.

Bergen, 21 May 2025

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