



Borregaard

COMPLIANCE WORK AT BORREGAARD

PUBLIC REPORT
2024



1. INTRODUCTION

Compliance at Borregaard is a continuous process of establishing standards and then ensuring knowledge and understanding of, as well as adherence to, those standards. Together with national and international legislation, Borregaard's internal guidelines set out the framework for compliance at Borregaard. Accordingly, this involves both having effective guidelines and governing documents in place and having a corporate culture that supports the objectives and ambitions of the company for compliance.

Borregaard has established governing documents for a number of relevant topics. These documents are regularly revised and distributed throughout the entire organisation and can now be found on digital platforms available to the entire global organisation. Various training initiatives on the most relevant topics are regularly held. Continuous efforts are made to systematise compliance by means of documentable control measures, reporting and improvement measures.

As part of its management and quality systems, Borregaard has several certifications and authorisation schemes from third parties. This has also been addressed in this report.

Arrangements are made to ensure that the Board of Directors is involved through ongoing dialogue and annual reporting, which is now aligned with the calendar year.

This reporting is internal and confidential. Nevertheless, a more concise and publicly available version outlining the main content as regards organisation and responsibility, main priorities and measures is also published. The publicly available report fulfils the wishes and expectations of various stakeholders and assessment bodies.

The Board report is internal and confidential. The present report is a more concise and publicly available version outlining the main content of the Board report as regards organisation and responsibility, main priorities and measures. The report fulfils the wishes and expectations of various stakeholders and assessment bodies.

2. ORGANISATION AND RESPONSIBILITIES

Compliance – a line responsibility

Compliance is a line responsibility at Borregaard. All managers and employees are responsible for complying with applicable legislation and company guidelines.

A fixed structure has been established with an annual meeting attended by the responsible parties (Managing Directors and Board Members) in subsidiaries ("Legal Heads Meeting"). A significant proportion of the content relates to the implementation of compliance matters.

Compliance has also been established as a fixed agenda item at board meetings of subsidiaries and internal steering committees, and templates have been created for meeting presentations to reflect this. An audit was also completed in respect of the formalities linked to the management of subsidiaries.

Overall governance structure

At Borregaard, a number of bodies are involved in the management and follow-up of the company. The annual report includes a dedicated chapter concerning corporate governance.

The administration includes several bodies involved in matters linked to the day-to-day management of the frameworks the company needs to comply with.

Compliance Board

The Compliance Board is an internal specialist committee that has the overall responsibility for contributing to compliance with laws and regulations in accordance with external and internal requirements and expectations. Through its work, the Compliance Board will support the line organisation with matters relating to awareness-raising, reporting, and contributions to improvements within the area. The work will be based on risk assessments.

The President and CEO appoints the Compliance Board and its chairperson. The Compliance Board consists of:

- Senior Vice President of Organisation and Public Affairs, chairperson
- General Counsel
- Person responsible for internal audits (VP of Finance)
- Chief Risk Officer (CRO)

A separate mandate has been drawn up for the Compliance Board. During the period from September 2023 until the end of December 2024, the Compliance Board convened seven meetings.

Sustainability Board

Sustainability is a key element in Borregaard's business model, strategy, and investments. The topic is receiving increased attention from several important stakeholders: the authorities, investors, financial institutions, and employees, and an increasing proportion of the value chain now integrates sustainability in business plans and initiatives.

Borregaard coordinates its sustainability efforts through a dedicated Sustainability Board, which plays an active role in the reporting of sustainability factors for the company's annual report, which constitutes an important source of information for a number of stakeholders, who regularly conduct assessments and ESG ratings. The integration of sustainability in all functions, as well as in the management and governance structure, is important to both Borregaard as a company and to its stakeholders. Some topics also fall at the intersection between compliance and sustainability.

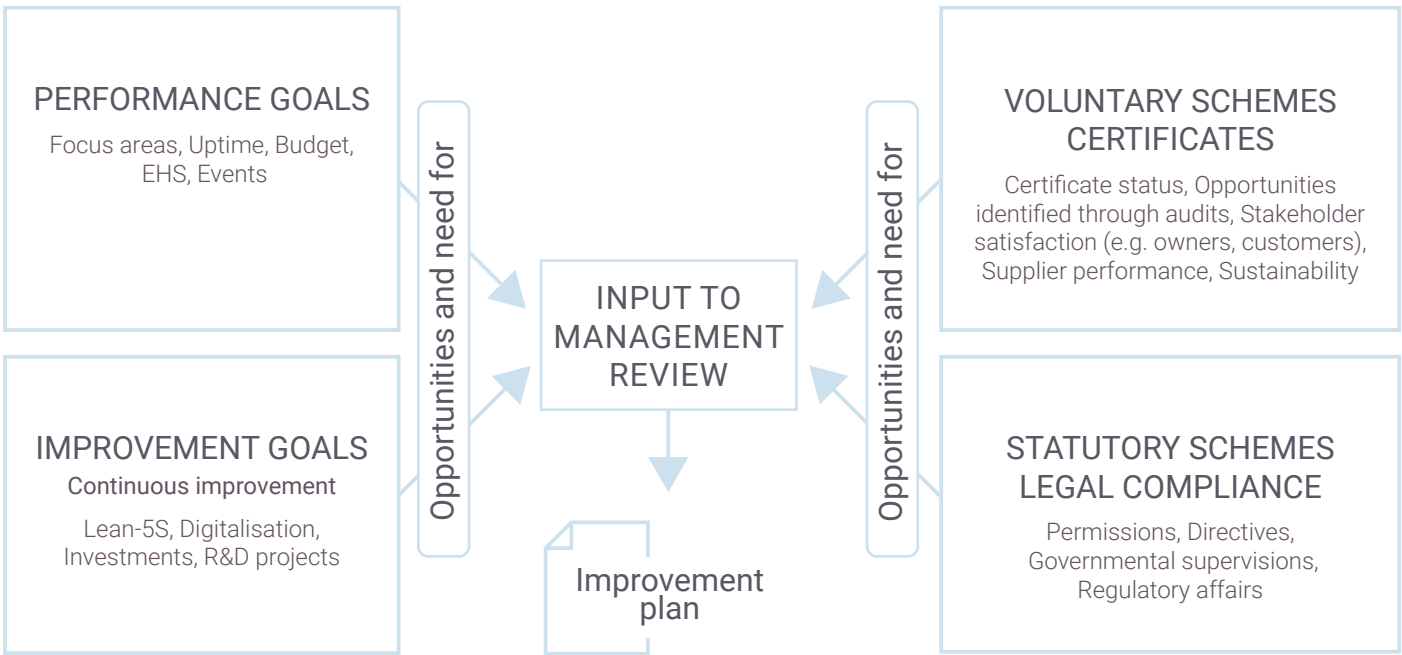
Similarly, expectations have also been placed on the Board of Directors' role in the work on compliance and sustainability, and the topics are discussed in more detail by the Board of Directors' Audit and Sustainability Committee.

Part of corporate management

Borregaard is committed to ensuring that work on compliance is integrated into the company's ordinary activities and uses the established systems and implementation arenas that already exist.

This means that compliance work is also subject to the same templates and systems for risk that Borregaard uses for risk assessments and risk management. Furthermore, the methodology employed in quality assurance and continuous improvement is also used in work on compliance and follows a continual process of planning, performance, auditing, and rectification/improvement.

The overarching governance process for the organisation, the Management Review, ensures that both internal factors and ambitions and external requirements and schemes provide input for improvements and opportunities, which leads to an improvement plan. The Management Review process shows that compliance factors and topics are an integral part of the company's follow-up and improvement work and can be outlined as follows:



Review of implementation and training

There are growing levels of attention being paid, both internally and externally, to how the company's policies and procedures are implemented and monitored, not least through training. The Compliance Board has monitored this in several areas, including through separate meetings with those responsible for implementing standards and measures in new and key areas. Examples of this are e-learning programmes within information security.

Compliance – risk situation

An overall risk picture has been drawn up for compliance (attached). The risk picture shows an assessment of key risk factors, the status of associated management systems and matters that have been addressed. Several matters have also been escalated within the organisation as a result of the management systems being employed. Further training and competence in topics such as corruption, ethics, and sanctions regulations are expected to lead to more compliance concerns being assessed going forward.

We are seeing a trend of increased complexity resulting from both internal and external factors. Common to these challenges is the fact that proper systems to ensure compliance allow for proper business decisions where these have been integrated comprehensively in operations, both by ensuring that opportunities can be exploited and that problems can be identified (and avoided) at an early stage. To the extent possible, Borregaard seeks to utilise the structures of the established management systems and internal expertise

with international experience in order to ensure the implementation of the systems. Where necessary, we consult external experts to ensure that our decisions are quality-assured. A number of areas have been identified as key drivers in influencing the complexity of business operations:

1. Changes to geopolitical framework conditions (weakening of international collaboration, increased levels of conflict, rivalry between great powers, and customs conflicts) and the interpretation of sanctions regulations. The wars between Russia and Ukraine and in the Middle East, together with the situation between the USA and China, are important risk factors here.
2. The Norwegian authorities have warned that EHS incidents and non-compliance with violation fees will be sanctioned to a greater extent than previously.
3. Information security. An increased degree of digitalisation combined with a growing threat picture for IT security.
4. An increasing number of guidelines are being published, particularly by the EU, in the form of legislation, regulations and directives based on sustainability topics (Green Deal, Fit for 55, Taxonomy): Several of Borregaard's market segments are subject to significant government regulation. This applies, for example, to stricter requirements and regulations relating to products for use in foodstuffs and feed, as well as an increased focus on the sale of ethanol to the fuel market. New requirements are also being imposed on products in relation to substance content (e.g. microplastics and formaldehyde), life cycle impact and recycling. There are also heightened requirements for classification and reporting from a financial perspective. Over the last year, the implementation of EUDR (the EU Deforestation Regulation) has become highly relevant (deferred until 30 December 2025) and, for 2024, Borregaard reports in accordance with CSRD (Corporate Sustainability Reporting Directive). The Norwegian act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (the Transparency Act) entered into force on 1 July 2022. A similar directive in the EU, the Corporate Sustainability Due Diligence Directive, entered into force on 25 July 2024. The directive covers negative human rights and environmental impacts within the organisation and in the value chain. All these factors entail stricter requirements in terms of competence, capacity and appropriate organisation and coordination of work.

Risk factors that affect each business area must always be included in the overall risk picture. The risk pictures are regularly reviewed by senior management together with the overall assessment of compliance.

Whistleblowing

The company's Code of Conduct sets out employees' responsibility and opportunity for reporting conduct they believe is in breach of laws and policies (whistleblowing). A whistleblowing poster has been produced in multiple languages to clarify the opportunities for reporting misconduct. There are also procedures on how whistleblowing cases should be managed, as well as responsibilities, roles and documentation requirements.

The company has a digital whistleblowing channel, and a separate group will assess submitted whistleblowing reports and determine who will be involved in investigating these. The whistleblowing channel can be accessed via the company's website, and there are several language options in the service. Both employees and external parties can submit reports via the whistleblowing channel, including anonymously, and it is still possible to report directly to one of the company's lawyers via the whistleblowing channel. Whistleblowing reports were received via the whistleblowing channel in 2024. These matters were investigated and managed at the relevant level within the organisation.

3. KEY PRIORITIES

Based on an assessment of risk, importance, and relevance, Borregaard has focused its work and monitoring on four priority areas:

- Important business-related legislation and the Code of Conduct (see section 3.1)
- Responsible sourcing (see section 3.2)
- Information security and privacy (see section 3.3)
- Certification, quality systems and compliance with EU/Norwegian laws and regulations (see section 3.4)

These priority areas do not preclude other matters and areas from being discussed, but the more extensive systems mentioned above will be used in these areas in particular.

3.1 IMPORTANT BUSINESS-RELATED LEGISLATION AND THE CODE OF CONDUCT

In this context, important business-related legislation refers in particular to legislation linked to corruption, competition, international sanctions and human rights both in our own operations and in the supply chain (see section 3.2). These are areas that Borregaard considers particularly important to emphasise. Firstly, because these areas are important from an ethical perspective. Secondly, because the consequences of violating these rules can be drastic. This applies to both public law sanctions (penalties, fines and surcharges), and civil law consequences (loss of customers, litigation risk, liability for damages, etc).

Plan/Documents

Borregaard's Code of Conduct sets out general guidelines for key areas requiring awareness and reflection on alternative courses of action. In some areas, the legislation will provide guidelines and limitations, while in other areas corporate policy is needed to guide actions. In cases where discrepancies exist between the Borregaard Code of Conduct and legislation, the strictest course of action shall apply.

Borregaard has regulations in place for all areas mentioned, and these have been set down in writing and communicated to all affected employees. In order to reduce the risk of violating international sanctions rules, the company has established a system to identify risky transactions in customer service systems. This means, for example, that a risk-based "Know Your Customer" assessment will be introduced for all new customers added. Account managers must actively confirm that such assessments have been performed, and the assessments must also be documented.

Activities and control measures

Borregaard updated its Code of Conduct in 2023. In 2024, training materials were drawn up in connection with the new Code of Conduct. Borregaard also has an interactive e-learning programme on anti-corruption, which combines knowledge of Borregaard's policies with dilemma training. The programme also ensures that a record is retained of who has completed the programme. New employees in relevant positions must complete the programme when joining the company and other employees must complete the programme as a refresher after a certain period. In 2017, Borregaard conducted a survey aimed at managers and other key personnel as the basis for assessing the risk of corruption within the organisation. Although Borregaard carries out sales and activities in areas with a relatively high risk of corruption, the conclusion of the survey was that the overall risk of corruption was low. Nevertheless, in such areas, the company has combined overarching and central activities with specific local initiatives to ensure that there is an understanding of the

importance of anti-corruption work. Examples of specific measures in high-risk countries include extremely restrictive use of agents, negligible use of cash transactions, background checks of new distributors and customers, increased training in connection with corruption, etc. Additionally, the corporate culture is strengthened by discussion, transparency and increased awareness and knowledge of corruption. The company will carry out a new risk assessment in 2025 and adjust initiatives based on the results of this assessment.

Since 2023, Borregaard has published annual, publicly available reports on due diligence pursuant to the Norwegian Transparency Act. The reports are available on the company's website. The company has also established a separate email address for related inquiries.

Competition law is a topic in the new employee induction programme. Written procedures have been established in subsidiaries that have joint owners who are also competitors (currently applies only to Florida). When conducting sales training (e.g. Borregaard Sales Academy), topics from competition law will be taught. Several questions have been raised concerning competition law by employees in Norway and abroad, which shows their awareness of potential issues. Competition law training will also be delivered to relevant employees in 2025.

The procedures relating to trade restrictions and sanctions are revised and updated on an ongoing basis as they are used. The system also ensures that employees in relevant positions become aware of the need for careful assessment of customers. As far as the administration is able to assess, the system does work as intended. The company has a dedicated resource to systemise and follow up on matters linked to trade restrictions and other import and export matters.

3.2 RESPONSIBLE SOURCING

Plan/documents

Borregaard has established governing documents in order to ensure responsible sourcing and appropriate quality at supplier level. The Director of Procurement and Strategic Sourcing is responsible for these documents. Responsible sourcing is endorsed in the general Procurement Policy, as well as in a dedicated Responsible Sourcing Policy. A special procedure has also been drawn up that includes a detailed description of how supplier approval will be performed, including responsible sourcing. The approval includes a step-by-step assessment based on risks and associated measures. The documents are available in the Corporate Manual, as well as in the Purchasing Portal.

Activities, control measures and new initiatives

The digital tool Ivalua has been implemented to ensure structured communication with suppliers, for requesting and obtaining quotations and for carrying out supplier approval and follow-up. In connection with the implementation, the requirements relating to supplier approval have been reviewed and strengthened, and the acceptance criteria have been clarified.

Ignite Procurement and Power BI are used for analytics, and standard reports are used. There are KPI reports for Sustainable Development Goals, assessment of new suppliers in accordance with responsible sourcing and supplier management and compliance in procurement processes, as well as for logistics deviations and the procurement of materials and chemicals.

Suppliers classified as “Strategic”, and a selection of “Bottleneck” suppliers are followed up by means of Supplier Development Action Plans (SDAs). Topics such as sustainability, safety and responsible sourcing are included as standing agenda items at SDA meetings and are documented in a condensed status overview for each supplier. EcoVadis Rating is used in supplier approval and follow-up and EcoVadis IQ is used for risk assessments relating to existing suppliers, with a focus on high-risk suppliers (“High risk” on “Overall risk”). The initiatives from the revision of the “Procedures for the procurement of goods and services” (July/August 2024) have been implemented. Each year, the quality department delivers training on “Safe food and food contact materials” for Strategic Supply employees. Extensive training on Ivalua has also been delivered to relevant users in Strategic Supply and across the organisation as a whole.

Annual maintenance and auditing of the supplier base have been carried out. During the reporting period, the quality department has conducted ten supplier audits and there has also been an internal audit on the procurement process, including at subsidiaries.

Both the use of tools and functionality are continuously improved. Some of the upcoming improvements include expanding the number of suppliers reporting via EcoVadis and replacing manual Excel overviews with regular reports in Ivalua and Power BI. Furthermore, an integration will be established between the data platform SAP and Ivalua and contract management will be improved through a new module.

3.3 INFORMATION SECURITY AND DATA PROTECTION (PRIVACY)

The Chief Financial Officer (CFO) has the overall responsibility within the Group management for information security and for ensuring that this work is organised and implemented in a safe and efficient manner. Operational information security work is led by the Chief Risk Officer (CRO). Information security also includes a responsibility to ensure that Borregaard operates in accordance with the applicable data protection regulations. A separate meeting structure has been established with a steering committee that is responsible for safeguarding and implementing the management system. During the period, this was expanded to include regular participation from procurement and OT (operational IT). The objective of the information security work is to ensure proper information management in our business processes, i.e. to ensure confidentiality (unauthorised access), integrity (quality of information) and availability (continuity). At the same time, information management must comply with applicable regulatory requirements.

Plan/Documents

Borregaard assumes that the company may be exposed to various threats related to information processing. Our risk management for information security shall be based on an updated understanding of the company’s exposure related to operations, changes and projects. Through active management of our information security policy, we aim to promote governance in the following areas:

- Information management strategy
- Confidentiality (information and classification management, as well as the responsibilities of the information owner)
- Awareness (training)
- Availability (criticality and contingency)
- Document retention (use of electronic archiving solutions)
- Mobility and access to information (regulations and threat awareness)

- Social media (communication regulations)
- Privacy (management system)
- Partners (process for criticality assessments and non-functional requirements relating to IT procurements)
- Culture (risk management and trust)
- Organisational changes (access controls)
- Change management

Threat picture

The threat picture changes constantly, and we monitor this via our partners, as well as through appropriate online channels, by means of which we always stay abreast of new and existing threats.

Development and improvement of procedures

- In 2024, simulated cybersecurity incidents were implemented among employees to identify the need for and impact of training. E-learning courses linked to information security were also conducted for everyone at Borregaard in 2024.
- The tools used to analyse and manage security at our units have been strengthened.

Privacy/GDPR

Plan/documents

Borregaard has created a risk-based management system to ensure that the company meets all expectations associated with the General Data Protection Regulations (GDPR). The system provides a detailed description of the regulations, including Borregaard's implementation, description of systems and guidelines for ensuring that privacy is properly safeguarded. The management system and associated supporting documentation are used actively when assessing new projects and system changes.

Activities, improvements and new initiatives

- There have been no requests for access to personal data from our own employees.
- No violations of the data protection and privacy guidelines have been reported.
- There have been three cases (employees leaving or dying) in which the company required access to file areas in order to secure customer information. The rules relating to the company's right of access were followed.
- Internal training of apprentices and the DS department was conducted during the period.
- The privacy management system has been updated to include clarifications relating to system descriptions.
- The management system is actively used to ensure correct administration of HR matters and technological developments, such as the use of AI.

Monitoring and follow-up

Selected matters and improvements are followed up on continuously by the Steering Committee for Information Security.

3.4 CERTIFICATIONS AND QUALITY SYSTEMS

Certificates and audits:

Borregaard maintains ISO 9001, ISO 14001 and ISO 50001 certification as the basis for its quality, environment and energy management systems. The management system is integrated so that all the standards are taken into account within the same work processes, and these are used as common platforms for the specialised certifications.

As regards product certification, Borregaard is certified in accordance with GMP+ FSA for feed products, FSSC 22000 (food safety system certification) for vanillin, and ISCC (international sustainability and carbon certification) for bioethanol for biofuel. Alvamix and biogas have also been certified in accordance with ISCC in order to prove zero emissions of greenhouse gases in the carbon allowance system.

Borregaard is PEFC-certified (Programme for the Endorsement of Forest Certification) and FSC-certified (Forest Stewardship Council) for wood and woodchips, as well as cellulose products and vanillin.

Bioethanol, vanillin, cellulose, hypochlorite, and hydrochloric acid are Kosher-certified. Vanillin is also Halal-certified. Within vanillin, a significant proportion of products are supplied from other producers. This applies to various blends produced in Singapore and Sweden, vanillin produced in China and ethyl vanillin produced in the USA. All producers have FSSC 22000, Kosher, and Halal certification.

During this period, Borregaard was audited in accordance with the standards' requirements for audit programmes and rectified any commented matters or non-conformities identified in these audits. The audit programmes also provide valuable input for other system improvements.

Internal quality audits of the management system:

Borregaard has established a programme for internal quality audits of the management system. The quality standards are revised by the Quality Department and by the EHS department in line with the scope of the certificates. With regard to quality standards, this covers production and research activities at the Sarpsborg site in Norway, including sales and distribution, and the scope of the environment and safety standards covers all physical locations for which Borregaard is responsible at Sarpsborg.

Commented matters and non-conformities have been rectified on an ongoing basis.

Customer and supplier audits:

Customer audits have now exceeded the pre-pandemic level. All audits are conducted on-site. It is typically customers who buy products for more advanced applications who choose to audit Borregaard (food/feed/pharma/batteries/oil). Customers often provide useful inputs for improvements.

For suppliers, the audit schedule is one of the outcomes of assessing supplier performance. Criteria for when Borregaard should audit a given supplier as the right tool for improvement efforts are under development. Today, suppliers of essential goods for the manufacturing of food and pharmaceuticals are audited, as well as the contract manufacturers of Borregaard's products (Biovanillin). Essential goods and services for pharmaceutical intermediates, and follow-up of contract manufacturers are subject to a generic schedule. These are audited every three years. No significant deficiencies have been identified at these suppliers during the period under review.

Supervision from the authorities:

There were several regulatory audits in 2024. Commented matters and non-conformities have been rectified on an ongoing basis.

Other certifications/audits

During the period, there were also external audits of sustainability, GRI sustainability verification. Commented matters and non-conformities have been managed on an ongoing basis.

Quality systems

Improving procedures

- Food safety: New editions of the standard (FSSC 22000) entail increased focus on food safety culture. This version, V6, was introduced in 2024.
- In preparation for a major system improvement, a thorough study of the new Quality Management System (QMS) was initiated in 2024.

Regulatory matters relating to chemical regulations

Borregaard has strengthened the organisation within the regulatory area relating to chemical regulations. The Regulatory Affairs team now consists of four individuals following internal recruitment in the USA in 2024 to improve proximity to the markets in question. The group works closely with market organisations, sector organisations and various regulatory authorities.

Approval of lignosulfonate as a feed additive

Following many years of work, lignosulfonate has been approved as a technological additive for use in animal feed in the EU/EEA. The Commission Implementing Regulation (EU) 2024/749 entered into force in March 2024 and approves the use of lignosulfonate as a binder in feed for all animal species. The approval includes, among other things, a specification based on the minimum lignosulfonate content and the maximum sugar content. In order to comply with the maximum sugar content requirement, there is also a requirement for only the listed yeast strains to be used for fermentation. These yeast strains are specific to the Borregaard process.

Future restriction on the use of PFAS

The EU's proposal for restrictions on PFAS (per- and polyfluorinated substances) constitutes a comprehensive measure to limit the use of these chemicals, which pose a serious threat to health and the environment. The proposal, drawn up by the authorities in Norway, Sweden, Denmark, the Netherlands and Germany, covers approximately 10,000 compounds and will be incorporated into the REACH regulations. Although a time-limited exemption has been included for certain areas of application, no general exemption has been proposed for industrial use of PFAS.

Borregaard has identified critical production components that contain PFAS, which will be extremely difficult to replace using alternative solutions. We have closely followed the process closely through our membership in EuroChlor, Cefic and Cepi. We have participated in meetings with the Norwegian Environment Agency together with the Federation of Norwegian Industries and have also engaged in dialogue with the suppliers of the aforementioned components.

The business areas continuously assess whether Borregaard's products can replace or reduce the use of PFAS in customers' products.

Microplastics

The REACH restriction on added microplastics (for the purpose of products and mixtures) was adopted by the European Commission in autumn 2023 and officially entered into force later the same year. The purpose of the restriction is to reduce the emission of microplastics to the environment as part of the EU's plastic strategy. There are different transition periods for different areas of application - cosmetics and pesticides, for example, are subject to specific deadlines in order to comply with the new rules. There are also exemptions and specific requirements relating to labelling and reporting for industrial use.

Borregaard's products are not directly affected by the restriction, given the exemption for soluble polymers (lignosulfonate) and degradable and natural polymers (speciality cellulose and microfibrillated cellulose). These exemptions were unclear or absent in the original restriction proposal and Borregaard has invested a great deal of work via sector organisations and with the authorities to ensure that there would be no unnecessary restrictions imposed on our products.

4. OTHER MATTERS

In addition to the priority areas, the Compliance Board also considers other topics and measures associated with these on an ongoing basis. These processes have involved dialogue between those working on the topics in question and the Compliance Board. Dialogue has been initiated both by the Compliance Board and by request from various departments.

Safe and Sustainable by Design (SSbD)

SSbD has been drawn up as part of the "EU's Chemicals Strategy for Sustainability – towards a toxic-free environment", which in turn is part of the EU Green Deal. SSbD is a framework for future definitions and criteria for the assessment of safe and sustainable chemicals and products. It will become an extensive and comprehensive framework that will, among other things, include hazard and exposure assessments for people and the environment from a life cycle perspective and will be crucial to the innovation process as a whole. Borregaard is following the work closely, including through participation in a Cefic working group.

UK Reach

The British authorities have introduced "UK REACH," which is an approximate copy of the European chemicals legislation, REACH. This means that Borregaard must register relevant chemical substances that are exported to the UK. The substances were reported (DUIN) before the deadline in 2021 and were scheduled for registration by the deadlines in 2023, 2025 or 2027 depending on classification and tonnage, but these deadlines have provisionally been postponed by 3 years due to political and practical reasons. Borregaard aims to register all substances in order to retain the current level of business.

EUDR

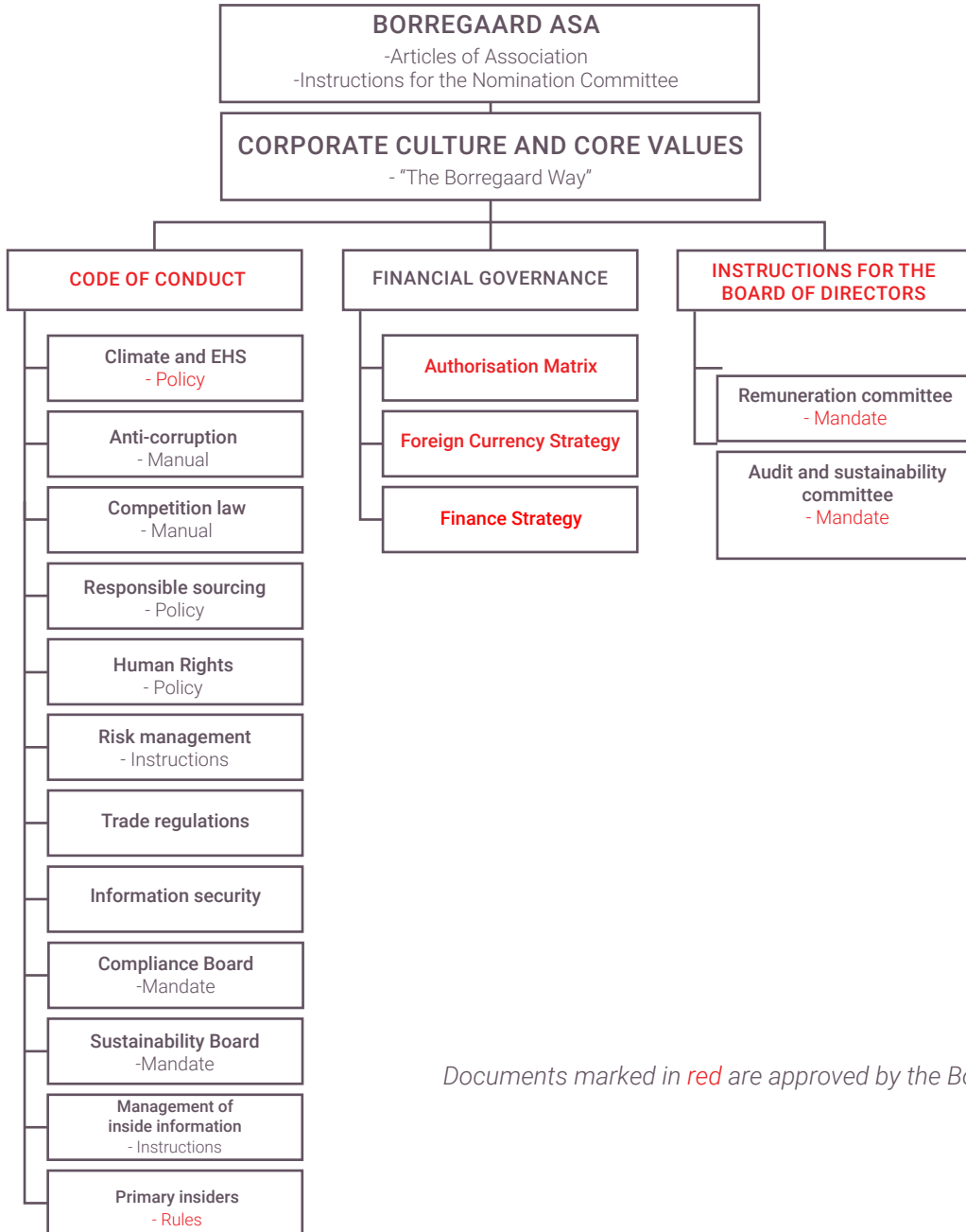
When the EUDR enters into force on 30 December 2025, it will be prohibited in the EU internal market to sell goods originating from areas that have been deforested (for agricultural purposes) or in which forests have been degraded. Affected products must be supplied with documentation confirming that they meet the requirements of originating from deforestation-free areas, being lawfully produced in the country of origin and being covered by a due diligence declaration. This will apply both to the sale and purchase of goods and means that Borregaard must establish systems and tools that meet the criteria well in advance of the deadline. A project has been established and working groups have been formed.

Appendix – for information

Structure – governing documents

Mandate for the Compliance Board

Structure – governing documents



Documents marked in red are approved by the Board

Compliance Board - Mandate

Introduction

The Compliance Board is an internal specialist committee that has the overall responsibility for contributing to compliance with public legislation (laws and regulations) and internal regulations. Compliance with such rules and regulations is a line responsibility at Borregaard. Through its work, the Compliance Board will support the line organisation with matters relating to awareness, reporting and contributions to improvements within the area.

The document

The SVP of Organisation and Public Affairs is responsible for this document.

Members

The CEO appoints the Compliance Board and its chairperson.

Mandate and Responsibilities

- Review and evaluate the organisation, training and due diligence measures in priority areas
- Initiate the establishment of guidelines in areas where this is needed
- Register non-conformities and issues, as well as propose improvements to current and relevant areas
- Report on overall issues, relevant topics and improvement measures
- The work must be based on risk assessments

Reporting

The Compliance Board will report to the CEO of the company through the main management meeting. The Board of Directors of the company will also consider reports and recommendations from the Compliance Board.

Reporting to the main management meeting must take place as needed, but at least once per year.

Reporting to the Board of Directors must take place as needed, but at least annually by way of a separate written report that will be included in the Board of Directors' review of the area of Compliance. The report will be reviewed by the Audit and sustainability committee prior to being considered by the Board of Directors.