



Norwegian Transparency Statement 2025

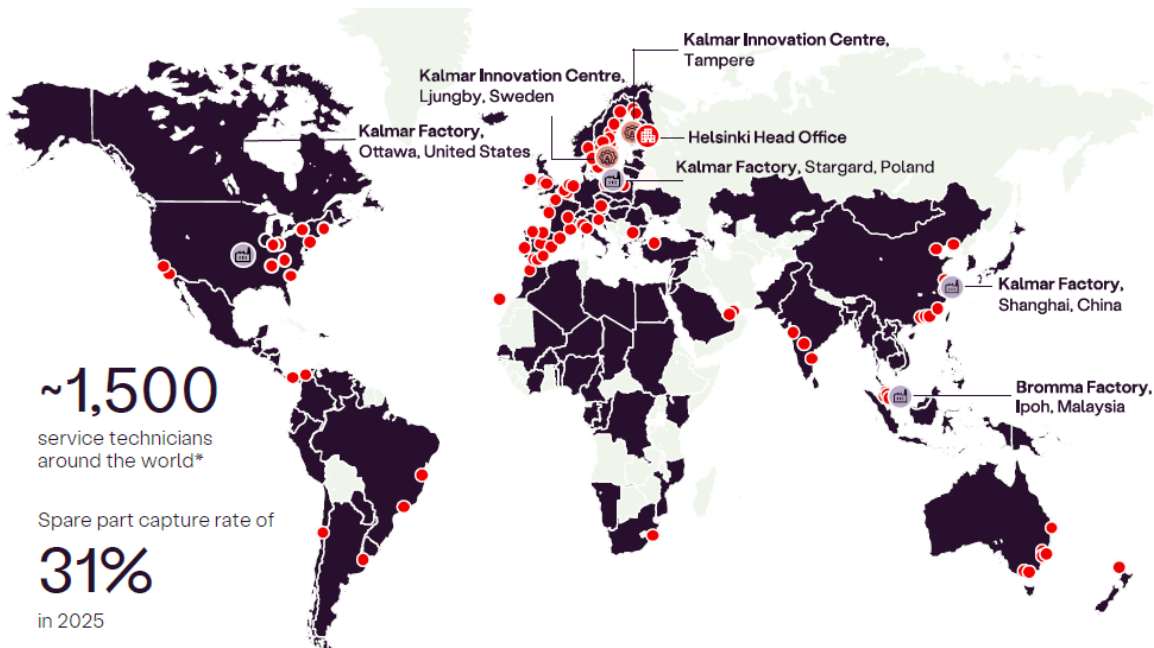
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This statement is issued by Kalmar Norway AS in accordance with Section 5 of the Norwegian Transparency Act (åpenhetsloven). It describes the due diligence activities carried out by Kalmar Norway AS during the 2025 financial year to identify, assess, and address actual and potential adverse impacts on fundamental human rights and decent working conditions within our own operations and across our supply chain.

Company overview

Kalmar Norway AS is a wholly owned subsidiary of Kalmar Oyj (Group) based in Helsinki Finland. Kalmar Norway acts as an importer of finished product and spare parts from the Kalmar Group operating internationally. Kalmar Group operates in the global heavy material handling market and offers a wide range of material handling solutions, including equipment and services, to ports and terminals, distribution centres, manufacturing and heavy logistics industries. In 2025, Kalmar Group had an annual turnover of EUR 1,741 million and employed approximately 5,300 people.

Kalmar Group has a global delivery footprint within critical value chains operating in Europe, North America, Latin America, Middle East and Africa, Asia and Oceania. Its business model is based on an asset-light and mainly assembly-only production footprint and the company has four assembly sites, located in Poland, the United States, Malaysia and China, and two separate innovation centres, located in Finland and Sweden. The Group has sales in over 120 countries and legal entities in more than 30 countries. Moreover, Kalmar Group is working with approximately 1000 direct suppliers and over 7000 indirect suppliers.



The main office of Kalmar Norway AS is located in Hagan, with additional service points in Oslo, Fredrikstad, Larvik, Florø, Stavanger, Haugesund, Bergen, Trondheim and Fauske. In December 2025, a total of 58 employees worked for Kalmar Norway AS.

Policy commitments

Being part of Kalmar Group, Kalmar Norway is committed to full compliance with the internationally recognized human rights standards and applicable labour-related national and international laws



and regulations. Kalmar Norway follows the group-wide governance framework, including the shared commitment to respect human rights, set out in the Kalmar Code of Conduct, the Human Rights Policy and the Business Partner Code of Conduct:

- **Kalmar Code of Conduct** sets the foundation for the corporate culture and establishes high standards for how business is done at Kalmar. It covers environmental, governmental and social topics, including human and labor rights. The Code of Conduct applies to all employees, directors and third parties acting on behalf of Kalmar and is publicly available on [kalmarglobal.com](https://www.kalmarglobal.com).
- **Kalmar's Human Rights Policy** defines the company's human rights related principles and workplace practices. It includes Kalmar's commitments to respecting internationally recognised human rights, the company's most salient human rights issues, as well as Kalmar's high-level approach to human rights due diligence.
- **Kalmar Business Partner Code of Conduct (BPCoC)** covers partners in all parts of the company's value chain, with more focus on the supply chain. It includes requirements for Kalmar's partners and suppliers related to human and labor rights, health and safety, environment and governance. Kalmar expects all its business partners to follow sustainable business practices, comply with laws and regulations and respect international human rights.

This governance framework is supplemented by the **Kalmar Norway AS Personnel Handbook**, which provides the employees with pertinent information on employment matters such as working hours and overtime, health and safety, time off, remuneration and benefits, in full accordance with the current Norwegian legislation.

To ensure the above policy commitments are acknowledged and understood, all Kalmar employees are required to complete a mandatory Code of Conduct e-learning training. The training highlights our basic requirements for all employees, and includes topics on respecting human rights. For example, all employees are expected to understand how to recognise potential human rights risks in their daily work and decision-making, and know how to report any adverse impacts. In 2025, all 100 percent –of Kalmar Norway employees completed the training.

Human rights due diligence

Kalmar Group implements ongoing human rights due diligence to identify and address adverse human rights impacts on people in its operations and value chain. The due diligence process is complemented by its remediation practice, which aims to rectify any actual adverse human rights impact that the company may have caused or contributed to. In addition to acting upon the findings, the company tracks its performance, and communicates on how impacts are addressed. All these steps together translate into a comprehensive management system and framework for how human rights-related impacts and risks are managed. This framework also covers Kalmar Norway's operations.



Identifying risks and impacts

Kalmar maintains continuous oversight to identify and understand actual and potential adverse human rights impacts. Insights are gathered from a range of sources, including individual project risk assessments, yearly audits, desk-based research, supplier sustainability assessments, the SpeakUp line, the Annual employee engagement survey and discussions with expert stakeholders.

While Kalmar works to ensure that all human rights are respected throughout its value chain, the company recognises the need to prioritise those impacts that are the most severe and most likely to take place and/or affect the most people. Kalmar has identified rights that are relevant to its business, and those that are at risk of being most severely impacted by its own operations, products, or services. These rights form the company's most salient human rights issues and are the focus of the due diligence:

- Health and safety
- Equal opportunities and non-discrimination
- Respectful treatment and non-harassment
- Freedom of association and collective bargaining
- Fair employment – wages and working hours
- Freely chosen employment
- Prohibition of child labour

In Kalmar Norway's operations specifically, the most relevant human rights risks identified relate to health and safety and fair working conditions– wages & working hours.

In addition, Kalmar Group has identified certain aspects within its value chain that carry an elevated risk of human rights violations. These high-risk factors are:

- **High-risk geographies:** The company operates and sources components from suppliers in certain countries and jurisdictions that are known to present a higher risk of adverse human rights violations.
- **High-risk sourcing categories:** The company procures components from third parties in specific industries associated with an elevated risk of human rights violations, including both particular industries and raw materials.
- **Vulnerable groups:** Vulnerable groups have been identified both within Kalmar's direct operations and throughout its wider supply chain.

Kalmar recognises that while human rights-related risks exist within its own operations, the most significant risk is situated in its complex, global supply chain.

Addressing risks

Kalmar Group employs a risk-based due diligence approach to address potential human rights-related issues. Consequently, the company focuses extra attention on the identified high-risk aspects, ensuring mitigation efforts are prioritised in these areas.



Own operations

Within its own operations, Kalmar Group has established robust processes and practices to prevent and mitigate human rights-related risks. These processes and practices are also implemented at Kalmar Norway's site. The management of human rights-related risks and impacts is integrated into several key processes, including, but not limited to:

- **Comprehensive HR processes and policies:** These are essential for mitigating human rights-related risks.
- **Employee engagement, including surveys:** Actively requesting feedback from employees to identify and address concerns.
- **Training and awareness raising:** Educating employees on fundamental human rights principles and their responsibility in upholding them.
- **Internal audits:** Regular assessments to ensure compliance with human rights standards and implement areas of improvements.
- **Proactive communication and guidelines:** Providing clear, timely information to cultivate a culture of respect and compliance.

During 2025, Kalmar Group continued to enhance its mitigation strategies by further developing its internal practices. A key initiative was the publication and implementation of a dedicated Human Rights Policy. The policy clearly defines the company's human rights principles and expectations, establishing a guiding framework for employees, partners, and suppliers. Additionally, Kalmar Group renewed its job architecture which promotes fair wages and diminishes the risks for discrimination with regards to compensation among Kalmar employees.

Kalmar Norway operates under the Industry Agreement (Industrioverenskomsten), a collective agreement that governs working conditions and employment terms. By consistently adhering to this agreement, the company ensures full compliance with national labor standards and promotes respect to the right of fair working conditions. Kalmar maintains regular dialogue with employee and union representatives through quarterly meetings and conducts annual wage negotiations to uphold transparency and collaboration. In 2025, 100% of Kalmar Norway employees were covered by this agreement.

During 2025 Kalmar Norway's onboarding process was further developed to guarantee all employees have fair access to resources critical to ensuring fair working conditions and a safe working environment.

Physical health and mental wellbeing continued as a key focus area for Kalmar Norway during 2025. While Kalmar Norway maintains a solid health and safety management system, the company implemented several measures throughout the year to further mitigate impacts on employee health and safety.

One of the most significant initiatives was the implementation of a new Health, Safety, and Environment (HSE) management system. This platform provides a simplified, accessible reporting channel for all safety-related cases, including observations, injuries, and improvement opportunities. It enables a systematic process for analyzing reports, conducting investigations, and implementing corrective actions based on group-wide best practices. Moreover, to further



strengthen the working environment, Kalmar Norway increased its engagement with third-party Occupational Health and Safety (OHS) representatives during quarterly workers' council meetings and enhanced proactive safety communication through bi-weekly EHS letters and site-based informative posters.

In addition, Kalmar Norway implemented targeted measures in 2025 to support employee resilience and organizational wellbeing. These actions focused on strengthening leadership support through improved sick leave follow-up and HR coaching, fostering a supportive corporate culture through increased site-level social engagement and team-building, and improving transparency by making welfare benefits and employee rights more accessible via the company's digital handbook and intranet. While these initiatives mark significant progress, Kalmar Norway remains committed to the continuous monitoring of mental wellbeing and workload management as a priority focus area.

Supply chain

Kalmar Group assesses its suppliers to identify and address adverse human rights-related impacts, and the company has incorporated strict people-related requirements for its suppliers. The assessments are supported by the following policies and practices:

- **Kalmar's Business Partner Code of Conduct (BPCoC)**
- **Supplier approvals and contracting:** As part of the supplier onboarding process, new direct material suppliers must meet pre-requirements and pass an audit conducted by the Kalmar before they can be approved as suppliers. The pre-requirements include an integrity assessment; committing to the BPCoC; and a supplier self-assessment on a third-party platform.
- **Supplier self-assessments and audits:** All strategic suppliers must complete the third-party administered supplier self-assessment, to evaluate their sustainability performance and associated risks. Suppliers with the lowest scores, indicating a higher potential risk, are then prioritised for third-party on-site audits.

Throughout 2025, Kalmar Group continued its supplier assessment and auditing efforts. Kalmar Norway relies on the Group's overarching efforts to manage upstream human rights-related risks associated with its products and services.

Monitoring

Within its own operations, Kalmar Group monitors employee health and safety through several key performance indicators, primarily the Total Recordable Injury Frequency rate (TRIFR). This metric tracks fatalities, lost time injuries, medical treatment injuries, and restricted work cases per million hours worked. Building on our commitment to safety, Kalmar Norway achieved a TRIF rate of zero in 2025. We view this result as a strong foundation for our ongoing work and remain dedicated to the continuous improvement of our safety culture and management systems to ensure every employee returns home safely.

Moreover, Kalmar Group utilises regular employee engagement surveys to collect direct feedback on a quarterly and annual basis. These surveys allow the company to track progress on critical



topics such as mental wellbeing and working conditions. While Kalmar Norway's 2025 results indicated that mental wellbeing continues to be a challenge requiring attention, the overall favorability score across the organization improved compared to 2024. Kalmar Norway remains dedicated to implementing targeted measures to support the psychological health and resilience of its workforce.

Within its supply chain, Kalmar Group continued to follow up on the requirements of its Business Partner Code of Conduct, through the supplier self-assessments. In addition, three supplier audits were conducted throughout 2025. Only minor and one moderate non-conformities were found in these audits, as classified by the third-party auditor. The audited suppliers received a tailored corrective action plan and are implementing them. The main improvement areas were related to management systems not being properly implemented.

Kalmar Group also continued to follow up on the non-conformities found during the 2024 audits. All six suppliers audited in 2024 were asked to provide the status of the implementation of their corrective action plans. Many of the non-conformities had been corrected, while some remained uncorrected. Kalmar Group is working with the suppliers to address all the identified non-conformities. In 2026, Kalmar will follow up on the findings of the 2025 audits and the implementation of the action plans as well as continue the third-party audits of suppliers with low scores.

Grievance mechanisms and remedy

Kalmar employees can report their concerns and potential misconduct through a variety of channels, including to their own manager; local or group-level human resources; the Ethics & Compliance (E&C) team; or through the company's SpeakUp line. Awareness of how to report concerns, and the SpeakUp line, is raised during the employee induction, through the company's annual mandatory Code of Conduct training, as well as through a variety of communication channels throughout the year. Kalmar also requires in its Business Partner Code of Conduct that its suppliers and other partners maintain a reporting mechanism that gives their employees and other stakeholders an opportunity to raise concerns.

Kalmar's SpeakUp line gives an opportunity to report suspicions of serious misconduct or actions that deviate from company values and policies. The SpeakUp line serves as an early warning system to mitigate risk and promotes high business ethics and trust within and outside of the organisation. Both internal and external stakeholders can use it for confidential and, where legally permitted, anonymous reporting.

Kalmar does not require that a person reporting a concern have proof of misconduct, but reports must be made in good faith. Kalmar never imposes sanctions or other retaliation measures on the reporting person unless a report has been made in bad faith, for example with the knowledge that its contents are false. All reported cases are evaluated confidentially by Ethics & Compliance and investigated if needed.

Kalmar determines remedial actions on a case-by-case basis. The Ethics & Compliance team advises relevant management and functional stakeholders (e.g., Internal Controls, HR, etc.) on appropriate corrective actions, such as improved controls, training, disciplinary actions or



termination of third-party relationships. Appropriate actions are determined based on the details of the case, the needs of the affected person or people, aggravating or mitigating circumstances and local legislation. The Kalmar Leadership Team discusses compliance topics and reviews the need for remedial and/or corrective measures during the bimonthly Code of Conduct panels led by the Head of Ethics & Compliance.

During 2025, there were no reports or concerns of potential misconduct in Kalmar Norway.



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