



Norwegian Transparency Statement 2024

Data Classification: Public

About Kalmar Norway

Kalmar Norway AS is part of the Kalmar Group (Kalmar Oyj, listed at the Helsinki stock exchange). Kalmar Norway 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 addition, Kalmar Norway sells spare parts, used equipment and offers a fleet of short time rental machines. A substantial part of the business is oriented toward services and maintenance delivery. More information on our range of products and services can be found [here](#).

The main office of Kalmar Norway AS is located in Hagan, with additional service points in Oslo, Fredrikstad, Larvik, Stavanger, Haugesund, Bergen, Trondheim and Fauske. In June 2024, a total of 54 employees worked for Kalmar Norway AS.

Policy commitments

Being part of Kalmar, we in Kalmar Norway are committed to full compliance with the internationally recognized human rights standards and applicable labour-related national and international laws and regulations. Our human rights commitment and principles apply to all aspects of our operations, as well as to our relations with any business partners. We aim to avoid any adverse human rights impacts across our whole value chain and we always mitigate or remediate such impacts should they occur.

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

Learn more about our [Sustainability](#) and [Human rights](#) commitments.

Human rights due diligence

Kalmar implements ongoing group-wide human rights due diligence to identify and address adverse human rights impacts on people in its operations and value chain, in line with international standards for human rights due diligence. The due diligence is complemented by our remediation practice, where we aim to put right any actual adverse human rights impact that we might have caused or contributed to. In addition to acting upon the findings, we track our responses, and communicate on how impacts are addressed. All these steps together translate into a comprehensive management system and framework for how we tackle human rights. This framework also covers Kalmar Norway's operations.



Identifying impacts

As part of the due diligence duty, Kalmar constantly assesses different parts of its own operations and value chain to identify impacts caused by the company; impacts that the company contributes to; and impacts that are directly linked to its operations, products or services through business relationships. In 2024 Kalmar conducted a human rights impact assessment, in collaboration with essential internal functions, such as Sourcing, Human Resources, Ethics and Compliance, Sales and Dealer Management, as well as with the support from a third-party. 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 applies a risk-based approach to identify and assess potential human rights impacts across its value chain, with a focus on areas where the risk is highest. The company has identified the human rights most relevant to its business and most at risk of severe impact from its operations, products, or services. These are considered Kalmar's most salient human rights issues and form the core focus of its human rights due diligence efforts. These key human rights issues include: health and safety; equal opportunities and non-discrimination; respectful treatment and non-harassment; freedom of association and collective bargaining; fair employment – wages & working hours; freely chosen employment; and prohibition of child labour. In Kalmar Norway's operations specifically, the most relevant human rights impacts identified relate to: health and safety; equal opportunities and non-discrimination; and fair employment – wages & working hours.

While Kalmar recognises that human rights-related risks may exist in its own operations, the company has determined that the greatest risk lies in its supply chain, due to its complexity and global reach. Kalmar reviews its human rights priorities when considered necessary and updates them when needed.

Addressing impacts

In 2024, Kalmar refined and clarified several roles to strengthen our sustainability efforts. Recruitment processes were initiated for roles in HR and HSEQ (Health, Safety, Environment and Quality) for Kalmar Norway. The HR role commenced in Q2 2024, while the HSEQ role will begin in Q1 2025. As a result, Kalmar Norway initiated and completed several measures to uphold our ethical guidelines and policies. These include: renewal of employee contracts, refining and clarifying several roles; and developing job descriptions for each position within the organization.

Moreover, 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. We maintain regular dialogue with employee and union representatives through quarterly meetings and conduct annual wage negotiations to uphold transparency and collaboration.

Moreover, Kalmar Norway is actively promoting an inclusive working environment where equal opportunities are granted and diversity is cherished and encouraged. Kalmar Norway works in a



male dominated technical market where we have few female applicants to available positions. We have high focus on this and will cooperate with schools aiming to recruit more female technicians, and have more advertisements encouraging female technicians to apply.

Within our own operations, Kalmar Norway is actively fostering a safety-oriented culture by prioritising efficient communication and proactive engagement with relevant stakeholders, as well as by empowering our employees to easily voice their concerns and suggestions. Furthermore, by organising regular on-site inspections and discussions with our suppliers, we aim to strengthen our collaboration and ensure alignment on our shared health and safety goals and standards.

During 2024, we took the initiative to further strengthen our HSE efforts, with a particular focus on increasing the visibility of our work on the working environment through internal communication channels. In addition, we are in the process of integrating a global digital HSE Management System, Quentic, which is scheduled for implementation in 2025. This system is designed to be user-friendly and make it easy to report deviations, supported by an effective notification feature.

Within the supply chain, Kalmar has included strict people-related sustainability requirements in its supplier onboarding and engagement processes. Through our Business Partner Code of Conduct, we require our suppliers and business partners to meet a set of human rights-related standards, in addition to all relevant applicable laws and regulations. We advocate for internationally recognised best practices at all levels of our value chain. The policies and processes supporting the supply chain due diligence include:

- Acknowledgement of Kalmar's Business Partner Code of Conduct (BPCoC)
- Supplier approvals and contracting
- Supplier sustainability assessments and audits
- SpeakUp line (accessible to both internal and external stakeholders).

Additionally, Kalmar has identified sourcing categories and suppliers whose products present the highest risk of containing critical minerals that may be linked to human rights violations in some geographical areas, and we request these suppliers to provide information on the smelters and refiners they work with. Kalmar aims to only use minerals in its products that come from Responsible Minerals Initiative (RMI) Conformant facilities that have successfully completed an assessment against the applicable RMI standard. This way Kalmar aims to ensure responsible sourcing of minerals from conflict-affected and high-risk areas, in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including its current supplements on tin, tantalum, tungsten and gold (3TG).

Monitoring

Within its own operations, Kalmar monitors the health and safety of employees with a number of key performance indicators, whereof the total recordable injury frequency rate (TRIFR) is the most commonly used. The TRIF rate is calculated based on the number of fatalities, lost time injuries, medical treatment injuries as well as restricted work cases divided by millions of hours worked.



Moreover, we utilise our employee engagement surveys to collect direct feedback from employees on a quarterly and yearly basis and thus track the state and progress of various topics such as equal opportunities and non-discrimination and psychological health and safety.

Additionally, Kalmar Norway ensures accurate monitoring of employee's working hours and absences through the use of various HR and payroll systems.

Furthermore, Kalmar conducts assessments and audits amongst its suppliers to ensure compliance with its policies and requirements. During 2024, Kalmar continued to follow up on the requirements of its Business Partner Code of Conduct (BPCoC), through the supplier self assessments and its supplier onboarding programme. To support suppliers with the lowest self assessment scores, Kalmar commissioned third-party onsite audits, focusing on human rights, with three suppliers during 2023. In 2024 Kalmar continued this work by re-auditing two of these suppliers and organising four additional audits. The audited suppliers received a tailored corrective action plan and are implementing them. In 2025, Kalmar will follow up on the findings and the implementation of the action plans as well as continue the third-party audits of suppliers with low scores.

Grievance Mechanisms and Remedy

All 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 team; or through the company's SpeakUp line. Kalmar's SpeakUp line is an externally hosted reporting tool for confidential and, where allowed by applicable law, anonymous reporting. The SpeakUp channel can be accessed by both internal and external stakeholders to make reports. 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.

Bredo Steen-Gundersen

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Country Director Kalmar Norway AS

26.06.2025