Statement pursuant to the Norwegian Transparency Act

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Contents

Background **3**

PostNord Strålfors' operations **3**

Service offering **3**

Market **3**

PostNord Strålfors AS as a responsible enterprise **4**

Group-wide guidelines 4

PostNord Strålfors' organization and routines **5**

Audits 5

Training and competence 5

Due diligence assessments **6**

Follow-up of initial due diligence work 6

Further risk mapping 6

Actual violations and significant risks 7

Further measures 7

Whistleblowing channels and complaints mechanisms **7**

Contact information **8**

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Background

Section 5 of the Transparency Act requires companies to publish an account of the due diligence assessments they have carried out. The purpose of this statement is to provide the public with insight into the company's key findings from these assessments and the measures that have been implemented.

PostNord Strålfors' operations

PostNord Strålfors is part of the PostNord Group, the leading provider of communication and logistics services in the Nordic region. PostNord is currently owned by the Danish state (40%) and the Swedish state (60%). PostNord Strålfors operates as a business function in Denmark, Sweden, Norway, and Finland, with a total of approximately 580 employees. With a shared goal of being our customers' preferred digitalization partner, we collaborate across the Nordic countries to continuously develop our Nordic platform. PostNord Strålfors' stakeholders include owners (PostNord AB), customers, business partners, suppliers, and authorities, as well as employees and the environment.

In Norway, PostNord Strålfors AS consists of around 40 employees across two locations. The company's offices are located at Alfaset in Oslo, while the production facility for letter production is located at Langhus in Nordre Follo.

Service offering

PostNord Strålfors provides omnichannel communication services to other businesses, where the core of our delivery is the personalization, formatting, and distribution of information to end customers. We offer distribution of information to online banking, digital mailboxes, email, SMS, and as physical letters delivered to mailboxes.

Market

Key markets in which we operate include banking and finance, debt collection, telecom, energy, and non-profit organizations. A common characteristic of the companies we work with is the need to send personalized information to large numbers of end customers. Many of our assignments relate to communication that leads to financial transactions, such as invoices.

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PostNord Strålfors AS as a responsible enterprise

Group-wide guidelines

PostNord Strålfors AS is part of the PostNord Group and follows the same governing documents. PostNord has established a Code of Conduct that sets out behavioral rules in the Group in areas most important for operating a sustainable business. PostNord also requires its suppliers and business partners to follow ethical guidelines (Supplier Code of Conduct). The Supplier Code of Conduct is available in several languages as an e-learning course on PostNord's website.

PostNord has also established guidelines and instructions related to various sub-areas, including but not limited to:

- Diversity Policy
- Health and Safety at Work Policy
- Anti-corruption Policy
- Climate and Environmental Policy
- Human Rights Policy
- Purchasing Policy
- Information Security Policy
- Data Protection Policy

Sustainability-related due diligence requirements are thus integrated into PostNord's business processes and purchasing activities.

Link: *PostNord's e-learning on our Supplier Code of Conduct*

UN Sustainable Development Goals

PostNord is a signatory to the UN Global Compact and our agenda contributes to the UN Sustainable Development Goals, in particular:

- Goal 3: Good health and well-being
- Goal 5: Gender equality
- Goal 7: Sustainable energy for all
- Goal 8: Decent work and economic growth
- Goal 9: Sustainable industry, innovation and infrastructure
- Goal 11: Sustainable cities and communities

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- Goal 12: Sustainable consumption and production
- Goal 13: Combating climate change
- Goal 16: Implementation and global partnership

Read more about our sustainability work at Group level in PostNord's Sustainability Report, available on our website. The report covers social, environmental, and economic results as well as key topics in 2025.

Link: *PostNord's Sustainability Report 2025*

PostNord Strålfors' organization and routines

PostNord Strålfors Group works systematically to identify risks of human rights violations and poor working conditions related to its suppliers and business partners. This work is carried out in collaboration with PostNord Sourcing, which has overall responsibility for ethical and business-related assessments linked to strategic procurement across the PostNord Group. PostNord Sourcing ensures onboarding of suppliers according to an established process and ensures regular review of already existing suppliers in collaboration with PostNord Strålfors Group.

PostNord Strålfors Group has established a Compliance Department with the purpose to ensure compliance with the company's obligations. The Compliance Department works cross-functionally to ensure compliance with laws and regulations, including the Transparency Act.

PostNord Strålfors AS is bound by several collective agreements. Continuous follow-up of the working environment is carried out in collaboration with employee representatives and through committees such as the Working Environment Committee (AMU), safety representatives, the main safety representative, occupational health services, and through our systematic work on improving the working environment.

Audits

PostNord Strålfors annually reviews routines for sales and procurement. We take a risk-based approach and have regular dialogue with our main supplier. PostNord Strålfors AS is certified according to ISO9001, ISO14001, and ISO27001.

Training and competence

All employees who start at PostNord Strålfors must complete mandatory training in the Code of Conduct and the company's security regulations. This training is

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also conducted annually for all employees. In 2023, PostNord also launched a nano-learning course on anti-corruption, which has been mandatory for all employees.

Due diligence assessments

Follow-up of initial due diligence work

PostNord Strålfors AS has continued to assess risks of human rights violations and poor working conditions based on the initial due diligence work. The initial work focused on our own operations and the service portfolio we offer. A high-level risk assessment was conducted, focusing on the supply chain related to our letter production and raw material sourcing. The supply chains examined account for 90% of the material used in physical letter production.

The assessment revealed that a small portion of the raw material used in paper production originates from Brazil, approximately 5% of the material used for letter production. Brazil is identified in United Nations human rights reports as facing challenges related to unequal land distribution, environmental degradation, and deforestation. These issues have been linked to threats against the livelihoods and rights of Indigenous peoples and traditional communities, increasing the risk of human rights violations. The United Nations has also reported that racism remains a significant and structural issue in Brazil. According to reports, people of African descent are disproportionately affected by discrimination, inequality, and violence.

The production facilities in Brazil hold FSC® Chain of Custody certification, which helps ensure that timber and fibers originate from well-managed forests and controlled sources. The standard includes controls to ensure that raw materials do not come from illegally harvested timber, that forests with high conservation value are protected, that genetically modified organisms are not used, and that the process does not contribute to violations of civil or traditional rights. The certificate was, however, due to renewal in 2025. PostNord Strålfors is taking actions to follow up on status of the renewal of the certification.

Additionally, PostNord Strålfors did express the need for a more thorough audit of the supplier, and an audit was conducted late 2025 in collaboration with PostNord Sourcing.

Further risk mapping

As the next step in the due diligence process, it was decided to examine suppliers related to the production machinery. A production machine consists of many components that may be imported from various countries, making this a

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potential risk area. We therefore conducted a closer review of our two largest suppliers of production machinery. Both suppliers have established guidelines for human rights and working conditions. They work systematically to prevent and detect violations, and they have whistleblowing channels that allow anonymous reporting.

Actual violations and significant risks

PostNord Strålfors has not identified any violations or significant risks within its own operations.

The suppliers examined in connection with our machinery are identified as low-risk suppliers. Procurement agreements for machinery suppliers always include the Supplier Code of Conduct and other relevant compliance requirements. The suppliers are subject to a qualification process prior to approval.

Further measures

PostNord Strålfors continuously works to optimize production. As part of this effort, we have standardized production lines to reduce the number of machines required. In addition, PostNord Strålfors has ongoing service agreements to ensure long lifespan of machine components.

PostNord Strålfors reports cases involving significant risk to PostNord's Procurement Department for further assessment. Suppliers are audited based on their risk classification.

PostNord Strålfors will assess all new suppliers according to standardized routines to identify risks of human rights violations and poor working conditions. Risks will be emphasized when entering new contracts. All suppliers are required to commit to our ethical guidelines.

Whistleblowing channels and complaints mechanisms

PostNord has a Group-wide whistleblowing system for reporting concerns about serious matters, including suspected violations of human rights and decent working conditions. The channel can be used by both employees and external stakeholders, and anonymous reporting is possible.

The whistleblowing function is designed to enable reporting of irregularities of public interest and irregularities involving actions or omissions that violate applicable EU law. This may include actions or omissions that violate laws, internal rules, or principles, including criminal acts or serious irregularities that are

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suspected to have been committed, sanctioned, or deliberately overlooked by PostNord. Irregularities may be intentional or negligent.

The whistleblower must, at the time of reporting, have reasonable grounds to believe that the information reported is true.

Examples of irregularities that may be reported through the internal whistleblowing function include:

- Financial crime, e.g., bribery, fraud, and forgery
- Workplace safety deficiencies
- Environmental regulation violations and pollution
- Discrimination and harassment in the workplace
- Violations of the ethical guidelines (Code of Conduct)
- Anything that violates applicable EU legislation

Links to the whistleblowing portal are available on the company's intranet and website. Link: *PostNord Whistleblower*

Contact information

For more information on how PostNord Strålfors works to safeguard fundamental human rights and decent working conditions, inquiries may be directed to:

Compliance@stralfors.com

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Betrodd tidsstämpel:
2026-10-13 10:23:36 UTC



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Betrodd tidsstämpel:
2026-10-13 10:49:01 UTC



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Betrodd tidsstämpel:
2026-10-20 14:42:14 UTC



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IP nummer: 78.72.169.127

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