

Responsible business conduct in Ecohz

A due diligence assessment vs the transparency act

1. Background

The Norwegian Parliament enacted the Transparency Act on June 10, 2021. This regulation provides legal requirements that Ecohz must abide by. We have a duty to report on what we are doing to be compliant and offer decent working conditions and fundamental human rights within the company, supply chains, and through business partners.

The Transparency Act also gives trade unions, organizations, journalists, the general public, and consumers the right to information about how enterprises handle potential and actual negative consequences that are revealed in the due diligence assessment. The Transparency Act is a Norwegian initiative, but is based on similar regulations on an EU level, as the Amending Directive of Corporate Sustainability Due Diligence from the European Parliament, and in other European countries.

2. About Ecohz

2.1. The enterprise's structure and area of operations

Ecohz delivers a range of global renewable electricity solutions, and provides Green Gas, Carbon Solutions and tailored Net Zero Roadmap to reduce clients' operational and supply chain emissions.

We have a portfolio of more than 400 power plants across 6 continents. We provide renewable solutions to corporates and electricity suppliers, and the portfolio comprises renewable electricity generated from hydropower, wind power, bioenergy, solar power and geothermal energy.

Ecohz currently has , and as the following ownership structure: Strawberry Equities AS (59,22%), Hafslund E-CO Vannkraft Innlandet AS (12,44%), Troms Kraft AS (12,44%), Aneo Renewable Holding AS (4,13%) and Kyrvatn AS (11,77%).

2.2. Governance in Ecohz

Ecohz has a solid system of guidelines and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions.

Ecohz uses Simployer as our platform for the employee handbook. In addition to the company guidelines and procedures, Simployer includes Norwegian laws and regulations on all relevant topics, and secures that procedures are continuously updated and in line with Norwegian law.

The company's overall HSE objectives are focused on providing a workplace that is safe, stimulating and rewarding, and that all our employees are looked after, both physically and mentally.

Our Code of Conduct is an integral part of the formal governance regime at Ecohz. It forms an ethical foundation, our values for driving the right behaviour and our

leadership attitudes for stretching our corporate culture in the desired direction. Everybody in Ecohz shall comply with the rules and guidelines.

Based on the Ecohz Code of Conduct we have developed an Ethical Business Framework that describes our expectations versus our suppliers and business partners.

Our responsibility for securing fundamental human rights and decent working conditions is organized as follows:

- The board and CEO: Responsible for the overall process and signing the report.
- Chief marketing officer: Responsible for conducting the survey among suppliers and business partners.
- HR: Responsible for updating the report yearly before June 30th, in addition to when significant changes occur. Analyse results from survey and prepare basis for decisions by the management team.
- Management Team: Decide on what measures to take versus suppliers or business partners that are not compliant to the Ethical Business Framework.

3. Due diligence Assessment

3.1. Our company

Ecohz is a small company with a thorough governance systems. We operate in Norway and are compliant with all relevant legislation.

Based on this we consider the risk for breaches of fundamental human rights or not having decent working conditions to be very low inside our company. Neither do we have any reason to believe that our contracts vs suppliers contribute to this.

3.2. Our supply chain and business partners

Ecohz has a complex supply chain with more than 400 suppliers across many countries. We have performed a risk analysis, and have divided our supply chain into 4 segments:

	Norway	Other countries
Business partners	<p>A) Office equipment etc</p> <p><i>Approx how many? Volume?</i></p> <p>Low risk</p>	<p>B) Office equipment etc</p> <p><i>Very few. Approx how many? Volume?</i></p> <p>Low risk</p>
Supply chain	<p>C) EAC, Green Gas, Carbon Solutions etc</p> <p><i>20-40 suppliers</i></p> <p>Low risk</p>	<p>D) EAC, Green Gas, Carbon Solutions etc</p> <p><i>100+ suppliers</i></p> <p>Medium risk</p>

We consider the risk for negative impacts to be low for our suppliers in Norway. These companies are subject to Norwegian laws and regulations, and in addition we know most of these companies quite well. Even if there is a possibility for challenges regarding human rights and working conditions in this segment, we consider the risks

to be low. We also rate our business partners from Norway to represent low risk based on the same criteria.

Business partners from other countries are very few, and because of the low volume we consider the total risk to be low in this segment.

Ecohz has an extensive supplier base outside Norway delivering goods and services connected to the core business. This is the segment where we consider the risk to be highest. These suppliers operate in different countries and cultures, and span from small companies with a few employees to large companies with several hundred employees.

4. How we perform the assessment

4.1. Internally

The Ecohz Code of Conduct forms our ethical foundation. It is a central document in our governance, and is easily available through our website, employee handbook and is signed by all new employees.

Ecohz conducts a yearly risk analysis, where the consideration for fundamental human rights and decent working conditions is an important focus.

Our continuous work and focus in these areas has not revealed any breaches.

4.2. Our suppliers and business partners

All business partners and suppliers are registered in our CRM system Hubspot. We have prepared a questionnaire for the main contact in every company, where we will ask for a confirmation that they are compliant to the Ecohz Ethical Business Framework. If there are areas of which suppliers are not compliant with, they are asked to describe the deviation, and what measures they plan to take to prevent this negative impact or risk in the future.

Even if we consider the risk for breaches to be highest in segment D, we have decided to include all segments in this first survey. We want all our suppliers to confirm that they are compliant to our Ethical Business Framework. In following up after the assessment, we will prioritize segment D.

The assessment was distributed June 13th with a response deadline of July 3rd.

5. Negative risks or impacts

Ecohz has no reason to believe that our business is involved in, either directly or indirectly, contributing to indecent working conditions or breaches of fundamental human rights. Still, conducting a survey among our suppliers and business partners will provide a more complete picture, and might point at areas where we can contribute to reducing risk for adverse impacts in these areas.

6. What measures we plan to take

The responses from the survey among business partners and suppliers will be registered in Hubspot. The management group will analyse the results and decide on what measures to take.

In cases where suppliers/business partners are not compliant with Ethical Business Framework, the management team will, based on the severity of the deviation decide to

- Give the supplier/business partner time to take measures to become compliant with Ethical Business Framework or
- Stop trading with the supplier/business partner until they have taken sufficient measures to be considered compliant.

All new suppliers will be asked to confirm that they are compliant with with Ethical Business Framework before signing an agreement with Ecohz.

When purchasing for Ecohz, all employees must check if the potential supplier is compliant with Ethical Business Frame.

7. Expected results

This is the first time Ecohz conducts this type of survey among our suppliers and business partners.

We are eager to learn from the process, both on how to develop the process itself, and to learn from the results we get and the effect of the measures we will take.

We are certain that this continuous process to secure decent working conditions and fundamental human rights will increase awareness both within the company and with our business partners and suppliers.

8. Routines for handling requests for information

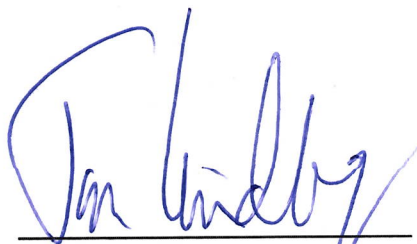
The Transparency Act gives the general public rights to the information about how enterprises handle potential and actual negative consequences that are revealed in the due diligence assessment. Ecohz has the following routines for handling this type of requests:

- All requests must be in writing.
- Request shall be sent to information@ecohz.com
- Ecohz is committed to answering the request adequate and comprehensible.
- Ecohz will answer in writing as soon as possible and no later than within 3 weeks. In some cases, a deadline of 2 months is allowed.

Oslo, 30/05/23



Chairman of the board
Kenneth Andersen



CEO
Tom Lindberg