



Due Diligence Assessment Report

Austri Raskiftet DA and Austri Kjølberget DA

Reporting year: 2023

Under the Transparency Act, Section 4, Austri Raskiftet DA and Austri Kjølberget DA is obligated to perform due diligence assessments to investigate whether there are any risks of or actual adverse impacts on human rights or decent working conditions in Austri's operations or in Austri's supply chain and other business relationships.

In 2023, we submitted our first Transparency Report, covering the year 2022, in accordance with the Norwegian Transparency Act. This updated report for 2023 details our continued efforts to improve human rights and decent working conditions in our business and supply chain. It provides an account of the due diligence assessments conducted in accordance with Section 5 of the Transparency Act and is available on the company's website.

The due diligence assessments for both Austri Raskiftet DA and Austri Kjølberget DA were conducted jointly, and thus the report applies to both companies, named Austri below. Both companies are managed by the same management and are exposed to the same types of risks regarding human rights and decent working conditions. The companies have shared management and board, and the value chain is nearly identical for both companies, with the primary suppliers being shared. If not otherwise specified, all information given applies to both facilities.

About Austri

Area of operation

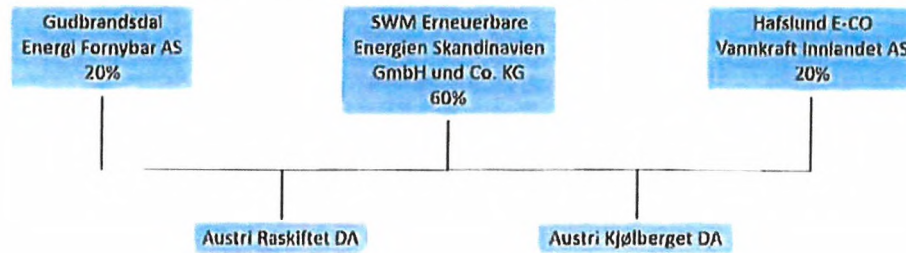
Austri is a producer of renewable energy and aims to create value through sustainable development of the region's resources. We place great emphasis on open communication and ensuring that development occurs in close collaboration with municipalities, landowners, neighbors and other stakeholders.

Austri Raskiftet DA operates and manages a wind farm called Raskiftet wind farm, situated in the municipalities of Åmot and Trysil in Innlandet county. This wind farm consists of 31 turbines generating approximately 370 GWh renewable energy per year.

Austri Kjølberget DA operates and manages a wind farm called Kjølberget wind farm. This wind farm is situated in Våler municipality in Innlandet county and consists of 13 turbines generating approximately 196 GWh renewable energy per year.

Our windfarms primarily offer electricity in the spot market. Additionally, we provide renewable energy certificates and origin guarantees.

Enterprise structure of Austri Raskiftet DA and Austri Kjølberget DA



Austri Raskiftet and Austri Kjølberget employ 8 people in total. These are management and technical personnel. Our main supplier, Vestas, is our turbine operator on both sites.

Ethical Guidelines

At Austri, we are committed to respecting and promoting fundamental human rights and decent working conditions in our operations and supply chain. Our Due Diligence Assessment under the Transparency Act supports this commitment. We also have Employee Ethical Guidelines that set expectations for our conduct internally and with business partners. We have zero tolerance for corruption and a procedure for internal reporting of unethical conditions. All these policies are included in our Employee Handbook and stipulated in employment contracts.

Austri Raskiftet DA has established guidelines for reporting reprehensible conditions. Employees can use two channels for reporting: either through their line manager or directly to the company meeting and/or one or more of the owner representatives in Austri Raskiftet DA/Austri Kjølberget DA.

Guidelines and Procedures for Handling Actual and Potential Adverse Impacts on Fundamental Human Rights and Decent Working Conditions:

To ensure compliance with the Transparency Act, we have established the "Transparency Routine Austri" as a guiding framework. This routine provides guidelines on the necessary actions to be taken if any violations of human rights are detected within our operations or supply chain. Any such violations must be recorded in Austri's quality system as formal violations. This requirement applies to both violations detected by employees and those reported by external stakeholders.

In cases where an external stakeholder notifies an employee about a violation, it becomes the responsibility of the employee receiving the report to record the violation in the quality system.

Furthermore, if the due diligence assessments reveal evidence of adverse impacts on fundamental human rights and decent working conditions, or if we become aware of violations through other means, it becomes the duty of the CEO to ensure the implementation of appropriate remedial measures and compensation. This responsibility can be fulfilled either directly or through

collaboration with relevant parties. This routine and the commitment to the requirements of the Transparency Act have been approved by the partners.

Initial assessments

In our work under the Transparency Act in 2023, we conducted a self-assessment and distributed questionnaires to selected suppliers. We maintained ongoing dialogue with our most significant suppliers throughout the year. Additionally, we reviewed these suppliers' own transparency reports from the 2022 reporting cycle. To further identify potential risk in our value chain we screened our full supplier list against The Norwegian Agency for Public and Financial Management's high-risk list (*DFØs høyrisikoliste*) which is a catalog of products linked to adverse impacts human rights and labor rights in their supply chain.

We consider the overall risk of adverse impacts to be low. This assessment is based on the fact that Austri is a small organization with relatively few suppliers. We have one supplier which accounts for the majority of our supplier transactions. Furthermore, this is supported by the result of our screening against DFØ's list. While a few suppliers are linked to high-risk industries, these are small suppliers which are not considered to have a significant impact.

Own business

Austri places great emphasis on safety and decent working conditions, as well as compliance with mandated standards and industry norms.

All our employees are permanent staff, and we support employee representation through collective bargaining, facilitated by elected union representatives, in order to foster a collaborative and compliant work environment. We hold daily whiteboard meetings where everyone can contribute with suggestions, feedback and concerns. We also conduct monthly meetings covering various topics, one of which has been the Austri Transparency Act routine.

Health, Safety and Environment (HSE) matters are systematically assessed in relation to various tasks as part of our HSE protocols and are managed through our internal control and quality management system.

In 2023 no HSE-incidents causing serious harm occurred.

Supplier assessment

During our 2022 reporting cycle, we focused on Vestas, our primary supplier, due to their industry's known human rights risks. We looked at the production of wind turbines, which uses materials like copper, cobalt, lithium, and aluminum. These materials may come from regions with child labor, wage discrimination, and poor working conditions. We discussed with Vestas their efforts to uphold human rights in the production, assembly, and transportation of wind turbine blades. This assessment did not identify any negative impacts related to Austri.

2023 has primarily been an operational year, with no new investments in technical installations and minimal component replacements on the wind turbines. Due to this, we chose to focus our due diligence assessments on labor practices in our supply chain. We particularly wanted to examine the working conditions of employees of our main suppliers and their subcontractors who work on our facilities. We based our selection on the deliveries to Austri in 2023 and reviewed the list to identify suppliers with whom we wished to discuss general matters related to their human rights work.

Vestas maintains its position as our main supplier and an integral partner in our operations through established, ongoing service agreements. These agreements encompass comprehensive operational and maintenance (O&M) services that ensure the continued reliability, efficiency, performance, and safety of our wind turbine facilities. We have established dedicated touchpoints for operational oversight. These touchpoints consist of both daily and biweekly meetings, and in addition regular top management meetings, ensuring regular and thorough communication channels for effective follow-up. We have also reviewed their 2022 transparency report. Based on this we sustain our conclusion that they are doing solid work in relation to human rights.

Energy management involves complex global supply chains, often characterized by a lack of transparency and openness due to business interests. For deliveries to Austria, this particularly involves hardware components and IT applications used in forecasting. While no actual negative consequences have been identified, this has been flagged as a potential risk by our supplier, which is also one of our owners, and is being followed up through their due diligence assessments.

In addition to our main suppliers, we also identified additional companies we deemed interesting, including suppliers involved in blade maintenance and development, and suppliers of workwear.

In total we selected four suppliers/subcontractors. They received a questionnaire which covered the following:

1. Company information and details about deliveries to Austria in 2023
2. Human rights and decent working conditions
3. Supply Chain Management in relation to section 2
4. Risk Management and Due Diligence
5. Health, Safety and Environmental (HSE) Management

Findings from the Due Diligence Assessments

Information regarding actual adverse impacts and significant risks of adverse impacts that the enterprise has identified through its due diligence

Actual Negative Impacts on Fundamental Human Rights or Decent Working Conditions

No actual negative impacts on fundamental human rights or decent working conditions were identified through our due diligence assessment

Potential Negative Impacts on Fundamental Human Rights or Decent Working Conditions

- One supplier had uncovered isolated incidents of breaches of working hour conditions within the organization. We are awaiting clarification on whether this involves deliveries to Austria.
- One supplier did not know if they allowed collective bargaining.
- Two suppliers did not know if the company had conducted due diligence assessments of risks related to human rights and decent working conditions in its own operations and supply chain.
- One subcontractor is currently under review by our supplier, to assess how their employment practices meet Norwegian requirements.

Future work and risk mitigation measures

Information regarding measures the enterprise has implemented or plans to implement to cease actual adverse impacts or mitigate significant risks of adverse impacts, and the results or expected results of these measures

We consider that risk within our own company is primarily related to HSE, which can also extend to employees of suppliers who perform work on our facilities. We are confident that HSE risks in our own company are already well-managed through existing HMS procedures and management systems. Nevertheless, we have taken additional steps to further ensure a safe working environment at our facilities, for both our own employees and those of our suppliers who perform work on our premises. In 2023 we established a dedicated position within the organization with the responsibility of overseeing HSE operations in Austri.

Based on our due diligence assessments we have concluded that the highest risk of human rights violations persists within our supply chain.

Austri is a small organization, and we handle risk for adverse impact on human rights and decent working condition through dialogue with our main suppliers. Further to this we will continue to monitor suppliers that we believe are at risk of violating human rights in their operations or supply chains. We will consider conducting due diligence assessments if we enter into larger contracts with new suppliers beyond our current owners. In cases of procurement of turbine blades, we will always conduct additional investigations and perform thorough assessments.

This report, in accordance with the Transparency Act, is updated annually by June 30th or in the event of significant changes. This is also stated in our annual report. Questions regarding Austri's work with the Transparency Act can be directed to our General Manager, Jan Roger Broen; jan.roger.broen@austri.no

12th June 2024



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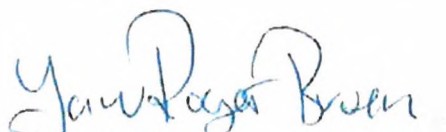
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