

Reporting year 2024

Transparency Act statement

Due diligence assessments for sustainable business practices

Due Diligence under the Norwegian Transparency Act

In accordance with Section 4 of the Norwegian Transparency Act, Austri Raskiftet DA and Austri Kjølberget DA are required to carry out due diligence assessments to identify and address any actual or potential adverse impacts on human rights and decent working conditions within their operations, supply chains, and other business relationships.

As both companies are managed by the same team and operate under nearly identical conditions, a joint due diligence assessment was conducted. This report therefore applies to both entities and refers to them collectively as “Austri,” unless otherwise stated. The companies share the same board of directors and management, and their value chains and primary suppliers largely overlap. Consequently, the risks related to human rights and working conditions are considered equivalent for both facilities.

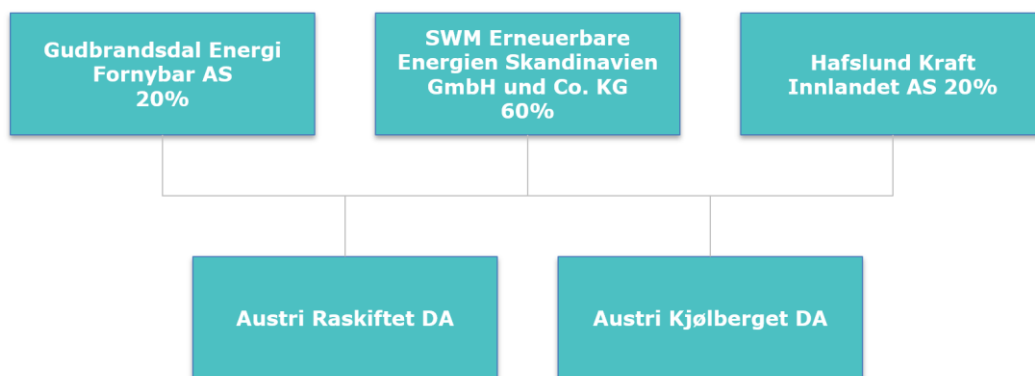
About Austri

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.

Austri Raskiftet and Austri Kjølderget employ 9 people in total, including one apprentice. These are management and technical personnel. Our main supplier, Vestas, is our turbine operator for both facilities. The enterprise structure of Austri Raskiftet DA and Austri Kjølderget DA is as follows:



Internal guidelines and routines

Commitment to Human Rights and Decent Working Conditions

At Austri, we are committed to respecting and promoting fundamental human rights and decent working conditions throughout our operations and supply chain. Our due diligence assessment under the Norwegian Transparency Act reflects this commitment.

We have established clear ethical expectations through our Employee Ethical Guidelines, which apply both internally and in our interactions with business partners. Austri maintains a zero-tolerance policy toward corruption and has implemented procedures for the internal reporting of unethical behavior. These policies are incorporated into our Employee Handbook and are also reflected in employment contracts.

Whistleblowing Procedures

Austri has established clear whistleblowing procedures to ensure that employees can raise concerns safely, responsibly, and without fear of retaliation. If an employee becomes aware of wrongdoing or unethical behavior, they are encouraged to report the matter through one of the following channels:

1. By notifying their immediate line manager, in accordance with standard reporting lines

2. By contacting the General Manager, Jan Roger Broen, directly at jan.roger.broen@austri.no
3. Through the whistleblowing service provided by Stadtwerke München GmbH, Austri's majority owner [here](#)

These channels are designed to offer flexibility, confidentiality, and support to ensure that all legitimate concerns are appropriately addressed.

Health, Safety, and Environment (HSE)

Internally, the primary area of risk is related to Health, Safety, and Environment (HSE), which also extends to supplier personnel working at our facilities. We are confident that HSE risks within our own operations are well managed through robust internal procedures, management systems, and a dedicated HSE resource position.

Austri places strong emphasis on maintaining safe and fair working conditions and ensuring compliance with applicable laws and industry standards. All employees are permanently employed, and we actively support collective bargaining through elected union representatives. This helps foster a collaborative and compliant work environment.

Employee engagement is a core part of our culture. We hold daily whiteboard meetings to encourage open communication and contributions from all team members. Additionally, monthly meetings are conducted on various topics, including routines related to the Transparency Act.

HSE concerns are systematically assessed as part of our daily operations and are managed through our internal control systems and quality management processes.

Transparency Act Compliance Routine

To ensure compliance with the Norwegian Transparency Act, Austri has established a formal framework known as the "Transparency Routine Austri". This routine outlines the procedures to follow when actual or potential violations of human rights or decent working conditions are identified within our operations or supply chain.

Any such violations, whether identified by employees or reported by external stakeholders, must be documented in Austri's quality management system as formal non-conformities. If an external party reports a concern to an employee, it is the responsibility of that employee to ensure the issue is properly recorded in the system.

In cases where due diligence assessments uncover evidence of adverse impacts, or where violations are identified through other channels, the CEO is responsible for ensuring that appropriate remedial actions and compensation measures are

implemented. This responsibility may be fulfilled directly or in collaboration with relevant stakeholders.

The Transparency Routine Austri, including our broader commitment to the obligations of the Transparency Act, has been formally approved by Austri's board of directors.

Due-diligence assessment

Methodology

Austri's work under the Transparency Act includes a comprehensive self-assessment of our internal operations, as well as targeted assessments of selected suppliers. The aim is to evaluate the risk of actual or potential violations of fundamental human rights and decent working conditions.

Our main suppliers have been assessed in earlier due-diligence assessments through our general survey. Each new reporting period has the aim of gaining a better understanding of our own impacts and the impact of our suppliers.

Based on our 2023 due diligence assessments, we have concluded that the highest risk of human rights violations lies within our supply chain. As a small organization, Austri addresses these risks primarily through continuous dialogue with key suppliers. We will continue to monitor and engage with those suppliers we consider to be at heightened risk of contributing to adverse impacts, either directly or through their own supply chains.

To guide our prioritization, we rely on the high-risk industry list published by the Norwegian Agency for Public and Financial Management (DFØ), as well as publicly available information on supplier practices. This combined insight helps us determine which suppliers should be prioritized for further assessment.

Supplier survey

This year's due diligence efforts included the following two activities:

1. General survey sent to two suppliers

The general survey covered the following topics:

- Human rights and decent working conditions
- Due diligence practices, including identification and management of risks
- Supply chain transparency and control over subcontractors
- Health, Safety, and Environment (HSE) management and related routines
- Employee rights, including working hours, freedom of association, and collective bargaining

- Whistleblowing systems and internal reporting channels
- Policies and training related to ethical conduct and compliance

2. Focused follow-up survey conducted with one higher-risk supplier

The focused survey was concentrated on the working conditions and HSE (Health, Safety, and Environment) practices for their technicians or their subcontractors. Of particular interest were their time registration routines, as we aim to ensure that technicians' or subcontractors working hours are in compliance with applicable labor laws.

Findings and results

The general survey

Both suppliers responded to all our inquiries and provided the necessary documentation. We appreciate their transparency and willingness to collaborate with us in our ongoing due diligence efforts. No notable findings were made.

The focused survey

The supplier reported that technician working hours are recorded using a digital app, and that their operations comply with the Norwegian Working Environment Act. Health and safety are supported through an integrated management system (IMS), ongoing safety training, and measures to promote work-life balance. Incident reporting is systematic, with monthly updates on work-related events shared with Austri.

The supplier acknowledged a few areas for improvement, including the need for closer collaboration on technician performance and field efficiency.

Overall, the survey indicated that the supplier has systems in place to support legal compliance and technician well-being, while also showing a willingness to improve operations through dialogue and cooperation.

Identified actual negative impacts on fundamental human rights and decent working conditions

No actual negative impacts on fundamental human rights or decent working conditions were identified through this years due-diligence assessment.

Through our measures we are pleased to see that our work under the Transparency Act is contributing to meaningful improvements and promoting

responsible business practices within our supply chain. See results of measures below.

Measures

Status on measures from 2023 reporting period

	Activity	Start year	Information	Status
	EXTERNAL			
a	Assessment of subcontractor's employment practices	2024	Please see further information below.	Completed
b	Follow-up on supplier regarding collective bargaining and lack of own due-diligence assessments	2024	Please see further information below.	Completed
c	Follow-up on supplier regarding breach of working conditions within their organization	2024	Please see further information below.	Completed
	INTERNAL			
d	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			Ongoing

a) Further information

Following last year's due diligence assessment, we engaged in dialogue with one of our suppliers after they informed us of issues related to a subcontractor's use of self-employed workers. A gap assessment between current practices and Norwegian labor law concluded that the subcontractor's employment model did not comply with Norwegian labor laws. Following a thorough process involving external legal experts engaged by both the supplier and the subcontractor, it was confirmed that the subcontractor's employment model in Norway was non-compliant. Upon recognizing this, the subcontractor took immediate steps to address the issues, which centered around the use of a self-employment model. These actions included the reclassification of workers, reporting to Norwegian authorities, and adjustments to salaries, remuneration, and holiday pay. Following the successful completion of these corrective measures and the

implementation of a new compliant employment model, the supplier will continue its collaboration with the subcontractor at Austri sites.

The challenges identified through this case also underscored a broader concern in that many companies have varying levels of understanding when it comes to Norwegian compliance requirements. In response, the supplier has introduced "Country Specific Requirements" (CSR) into all agreements with subcontractors. Rolled out in 2024, the CSR outlines clear expectations around employment compliance in Norway and is now a standard requirement for all subcontractor activities in the country.

b) Further information

In the follow-up, the supplier confirmed that while their company is not unionized, they engage in direct negotiations between employees and management. Additionally, the supplier acknowledged that they do not currently conduct formal due diligence assessments specifically focused on human rights and decent working conditions. However, they emphasized a commitment to ensuring compliance with legal standards across their operations and supply chain, highlighting that health, safety, and fair treatment are integrated into their risk assessment and method statements (RAMS).

c) Further information

One of our suppliers identified isolated breaches of working hour regulations within their organization. To determine whether these violations were connected to services delivered to Austri, we engaged in dialogue with the supplier. They have since provided written confirmation that the breaches did not occur in connection with any work performed for Austri.

New measures for reporting period 2025

Activity	Start year	Estimated date of completion
EXTERNAL		
On-site audit of main supplier	2025	2025



austri
vind

Austri Raskiftet DA
Austri Kjølberget DA

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

28th May 2025

Thomas Eisele

SWM Erneurbare Energien

Skandinavien GmbH und Co, KG

Per Oluf Solbraa

Gudbrandsdal Energi

Fornybar AS

Stig Morten Løken

Hafslund Kraft Innlandet AS

Innlandet AS

Jan Roger Broen

CEO

Signatur sertifikat

Dokumentnavn:

Austri Vind - Due Diligence Report 2024 final

Unikt dokument Id:

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Undertegnede

 Jan Roger Broen CEO Austri Raskiftet DA and Austri Kjølberget DA E-post: jan.roger.broen@austri.no Enhet: Edge 136.0.0.0 on Unknown Windows 10.0 (desktop) IP adresse: 212.251.222.162	<p>Tillitsfullt tidsstempel: 2025-05-28 09:52:56 UTC</p> 
 Thomas Eisele SWM Erneurbare Energien E-post: eisele.thomas@swm.de Enhet: Edge 136.0.0.0 on Unknown Windows 10.0 (desktop) IP adresse: 188.164.235.34	<p>Tillitsfullt tidsstempel: 2025-05-28 10:55:26 UTC</p> 
 Per Oluf Solbraa Gudbrandsdal Energi E-post: pos@geholding.no Enhet: Chrome 136.0.0.0 on Unknown Windows 10.0 (desktop) IP adresse: 185.195.143.132	<p>Tillitsfullt tidsstempel: 2025-05-28 11:14:23 UTC</p> 
 Stig Morten Løken Hafslund Kraft Innlandet AS E-post: stig.morten.loken@hafslundeco.no Enhet: Edge 137.0.0.0 on Unknown Windows 10.0 (desktop) IP adresse: 185.63.208.132	<p>Tillitsfullt tidsstempel: 2025-06-02 07:19:20 UTC</p> 

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Tillitsfullt tidsstempel

2025-06-02 07:19:20 UTC

Hendelse med innsamlede revisjonsdato

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2025-05-28 09:53:11 UTC

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Enhhet: ()
Kommentar: Signert nå ;)

2025-05-28 09:52:56 UTC

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