

Account of Human Rights Due Diligence

Ernst & Young AS
2025



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Summary of Human Rights work in EY Norway

EY Norway (Ernst & Young AS including all affiliated entities) is committed to upholding and promoting human rights and decent working conditions in line with the Norwegian Transparency Act. We believe that respect for human rights is fundamental to advancing our purpose of "Building a better Working World". The commitment to uphold and promote human rights is anchored with EY Global Executives and with the management and board of EY in Norway.

EY Norway regularly conducts due diligence in its own operations and supply chain in accordance with the requirements of the Transparency Act. Based on our assessments, we have identified human rights issues in own operations and value chain that EY Norway needs to pay particular attention to.

- In EY Norway's own operations we have identified three areas where the risk of negative impact is the highest:
- The right to fair and favorable working conditions (including rest, leisure and reasonable limitation of working hours)
 - The right to health (physical inactivity in the working day, mental health linked to high work intensity and stress levels)
 - The right not to be subjected to discrimination and harassment

In recent years, we have prioritized in-depth assessments of suppliers to EY Norway with a medium or high risk of human rights violations. The level of risk is based on assessments of supplier's country, industry, raw materials in the supply chain and available information on human rights maturity. In total, we have identified 13 rights that are particularly relevant to our value chain from raw material to final products/services.

In 2025 EY Norway has done additional assessments of its suppliers focusing on the hospitality sector due to its inherent risk of negative impact on human and labor rights also in the Nordic context. EY's global procurement ESG-team performs an in-depth due diligence on the suppliers where we have the largest spend. This year that includes 10 suppliers from EY Norway. Further EY Norway have performed a desktop due diligence on 55 vendors and will follow up with four local suppliers that fall below the global threshold. In addition to due diligence of existing vendor relationships EY Global Procurement has also strengthened the Human Rights due diligence in all real estate projects to ensure that EY's expectations to human rights are set from the start.

EY Norway also has services performed by legal entities in the wider EY network of member firms, including internal service centers. We have assessed risks based on services EY Norway purchase, inherent country and industry risks and feedback from Nordic employees. Further we have identified global policies and controls in place to uphold human rights in EY's Global network.

EY Norway has well established processes in place to ensure human rights in its own operations, and we have continued working on the measures and processes we described in the 2024 report. Based on this year's due diligence assessment, we have identified new measures for the coming year that will further strengthen the work to secure rights in EY Norway and for our suppliers.



About us and our commitment to respecting human rights



EY is one of the world's leading centers of expertise in auditing and advisory services. Our work covers audit, tax, strategy and transaction and consulting services with over 400 000 employees in more than 150 countries and territories. In Norway, we are more than 2 300 colleagues in 26 geographical locations. For more information on EY's legal structure, ownership and responsibilities, please read our [Transparency Report for fiscal year 2024](#).

In the Nordic countries, the audit and advisory industry is strictly regulated with several statutory controls and procedures. However, negative impacts on employees' rights when at work or in the recruitment process may occur, this is a risk which can be present in any workplace. As a global organization where we also purchase services from member firms across borders, there may be differences in public controls and procedures, which can lead to varying levels of risk. However, the biggest risk for negative impact on fundamental human rights is in our external supply chain.

Respect for human rights is directly linked to EY's purpose to "Building a Better Working World". Our approach to and compliance with human rights is in line with international human rights conventions, such as the International Covenant

on Political and Civil Rights, the International Covenant on Economic, Social and Cultural Rights as well as the International Labour Organization's (ILO) 10 core conventions. Furthermore, we conduct our business in line with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

On 1 July 2022, the Transparency Act came into force in Norway and as a result, EY Norway in collaboration with the rest of EY in the Nordic countries developed a process for performing human rights due diligence assessments of our own operations and our supply chain. In this report we will outline EY Norway's and Nordics human rights due diligence process, how EY in the Nordics work to identify risks related to human rights, and our measures to prevent negative impact on human rights.

Establishing effective routines for human rights due diligence is on the current agenda of most large companies in the Nordics, not only because of the Norwegian Transparency Act but also the incoming sustainability regulations and directives from the EU. The findings from our human rights due diligence are also implemented in our double materiality assessment towards identifying EY's material impacts.

Respecting human rights in our own operations

Anchoring responsibility – policies and processes

EY's "Ethical Compass" is our Global Code of Conduct – guiding principles that are the corner stones of our culture. It reaffirms EY's commitment to safeguarding the integrity and ethical concerns of its employees. In addition, we have global and local governing documents that address EY's commitment to respecting human rights and supporting them in our operations.

Our policies and statements for human rights in EY's own operation:

- [EY Global Code of Conduct](#)
- [EY Global Human Rights Statement](#)
- [EY Global Executive \(GE\) Diversity, Equity and Inclusiveness Statement](#)

EY's Global Code of Conduct has clear principles that guide us in our actions and the way we do business and must be adhered to by everyone at EY globally. All EY employees must complete training and sign that they work in accordance with the Code of Conduct annually. In the fiscal year 2024, close to all (99%) partners and employees completed the training, and all (100%) signed an understanding of and commitment to comply with the Code of Conduct. Behavior that violates our Global Code of Conduct, such as discrimination or sexual harassment, is not tolerated and will have consequences.

In addition to our Code of Conduct, we have a Global Inclusion and Non-Discriminatory Internal Policy and a public Global Executive Diversity, Equity & Inclusion Statement. These not only emphasize the importance of diversity and inclusion to the business but also ensure that EY member firms are responsible for its progress,

starting with management attitudes. The work on diversity, equity, and inclusiveness at EY Norway is rooted in the management and the board and incorporated in EY processes.

In the audit and consulting industry, there is relatively high turnover of employees because our staff are attractive to other employers. Many recent graduates spend their early working years as auditors or consultants before taking that experience with them to new jobs. Given this characteristic of the industry, it is even more important to work systematically and repeatedly on diversity, equity, inclusiveness and belonging to ensure that employees are always familiar with our routines, policies, and ambitions. For new hires, there are monthly information meetings ("Welcome to EY") where the top management in the Nordics discusses EY, our strategy, and values, including our work on diversity, equity and inclusiveness. This way, the "tone from the top" is set from the start.

Nordics Ethics Board

To maintain and enforce EY's ethical guidelines in Norway and the Nordics, a Nordic Ethics Board has been established with the mandate to investigate and follow up on reported ethical issues. The Ethics Board's mandate is to ensure that all alleged breaches of EY's Global Code of Conduct, global policies, global non-discrimination guidelines, and/or other violations of the organization's core values are thoroughly investigated, and confirmed breaches are handled appropriately with suitable sanctions.

EY Norway and Nordics has strict guidelines and practices against retaliation to protect anyone who reports a problem. Reported breaches addressing concerns in or related to Nordics are referred to the Nordics Ethics Board, which has the primary responsibility for investigating. For minor breaches, the Ethics Board may delegate the case to the relevant service area or function. The Nordic Ethics Board is also structured to enable the handling of cases at the national level as needed.

The members of the Nordic Ethics Board are:

- ▶ Andreas Fahlén, Sweden – Nordic Legal Responsible
- ▶ Line Sandnes, Norway – Nordic Talent Lead
- ▶ Lasse Laurio, Finland – Senior Partner
- ▶ Carina Korsgaard, Denmark – Senior Partner

Working Environment Committee

In line with Norwegian law on working environment, EY Norway has a Working Environment Committee, where the company (EY Norway) the employees and health and safety staff are represented. The company and employees have an equal number of representatives on the committee. The committee chair is alternated between the company's representative and employee representatives. The safety representative will address various matters related to occupational health and internal safety services. This includes overseeing training, instruction, and information within EY Norway that significantly impacts the working environment. They will also handle plans requiring consent from the Norwegian Labour Inspection Authority, as well as other plans of importance to the working environment, such as those related to construction, rationalization, work processes,

and preventive safety measures. Additionally, the safety representative is responsible for establishing and maintaining internal control systems, addressing health and welfare issues associated with working time arrangements, reviewing all reports concerning occupational hygiene investigations and measurement results. The Working Environment Committee must submit an annual report about their activities to the company's governing bodies, employee organizations and the Norwegian Working Environment Authority in accordance with detailed rules.



Routines for uncovering negative impact on human rights

Employee dialog and engagement

The ground for all our measures to reduce the risk of any negative impact on our employees, is based on how we engage with our workforce about the things that concern them. In EY Norway, we have several channels and methods to ensure healthy conversations between our employees and management; and between EY management and our external stakeholders. We engage and communicate with our employees in several ways – both directly; using surveys; the work done in our firmwide fora with employee representatives in EY Norway; and through our communities of interest.

People Pulse Survey

In EY Norway, we conduct the employee survey, the 'People Pulse Survey,' three times a year to examine and measure well-being, sense of belonging, autonomy, and other aspects of everyday work at EY Norway. Our goal is to see a continuous increase in the Engagement Index and achieve 80% in terms of the Exceptional Experience Rating. The measurement from November 2024 shows: Engagement Index 77%, which is the same result as last year, and Exceptional Experience Rating 73%, also the same rating as June previous year. 87% of EY Norway's employees agree that EY provides a work environment where they feel free to be themselves. The results are followed up with analyses and improvement measures. EY's Talent (HR) department is constantly working to ensure that employee welfare and rights are preserved, and employee feedback helps influence actions and priorities.

EY employee networks

To avoid exclusion and create security, EY in the Nordics and Norway have several networks to support belonging and inclusion. The groups are open to all and aim to provide a sense of belonging

while ensuring a communication channel to management with a focus on inclusion. The groups include International @ EY, the Rainbow Network Norway, Nordic Culture & Ethnicity Employee Resource Group, Neurodiversity Resource Group (new in 2025), and a focus group to ensure access for individuals with reduced functionality to EY. The networks serve as valuable partners for management at EY Norway and the Nordics, providing insights into employee experiences and offering feedback on both discrimination risks and opportunities for initiatives. EY Norway also ensures that representatives from the networks have a common arena to discuss experiences, priorities and actions together with leadership to promote dialogue and cohesive actions.

Risk assessment

Further, EY Norway also conducts an annual risk assessment for employee discrimination. The risk assessment is part of EY Norway's annual Compliance and Risk Assessment, and EY Norway's Talent (HR) Director is responsible for following up on deviations and implementing measures. Integrated activities and measurements in the majority of our Talent-related processes strengthen our focus on diversity, equity, belonging, and inclusiveness.

Ethics Hotline – EY's whistleblowing channel

As part of our commitment to uphold compliance with our ethical guidelines and comply with applicable laws, EY has a whistleblowing mechanism called the "EY Ethics Hotline". This is a third party channel managed by EY Global and implemented by all EY member firms. EY ethics hotline allows EY clients, partners, employees and other actors outside the organization to anonymously report activity that may be unethical, inappropriate,



in violation of professional standards, or contradict EY's values and Code of Conduct.

Reports, whether written or oral, submitted to the EY Ethics Hotline are promptly addressed by the Nordic Ethics Board. Each case is evaluated according to EY's standardized processes to determine the severity of breaches and appropriate consequences. Where relevant, EY Nordics also provide redress or compensation.

At EY Norway, it is most common for complaints or concerns to be raised through managers, counselors, or other contact persons. All cases, regardless of channel, are handled by the Ethics Board if there is suspicion of violations of the Code of Conduct, with EY management being informed as necessary.

Through our work to ensure compliance with the Code of Conduct, and through frequent communication of the Code, we strive to create an environment that encourages all employees to behave responsibly – and to report any deviations without fear of reprisals.

Cases reported

In fiscal year 2024, EY Norway registered six potential breaches of the Code of Conduct which were reported to Nordic Ethics Board. All cases were addressed in accordance with internal procedures. Of the six reported cases, three were assessed as breaches or partial breaches of EY's Code of Conduct. None of the reported incidents were concluded to have a serious impact on human rights, characterized as harassment or discrimination.

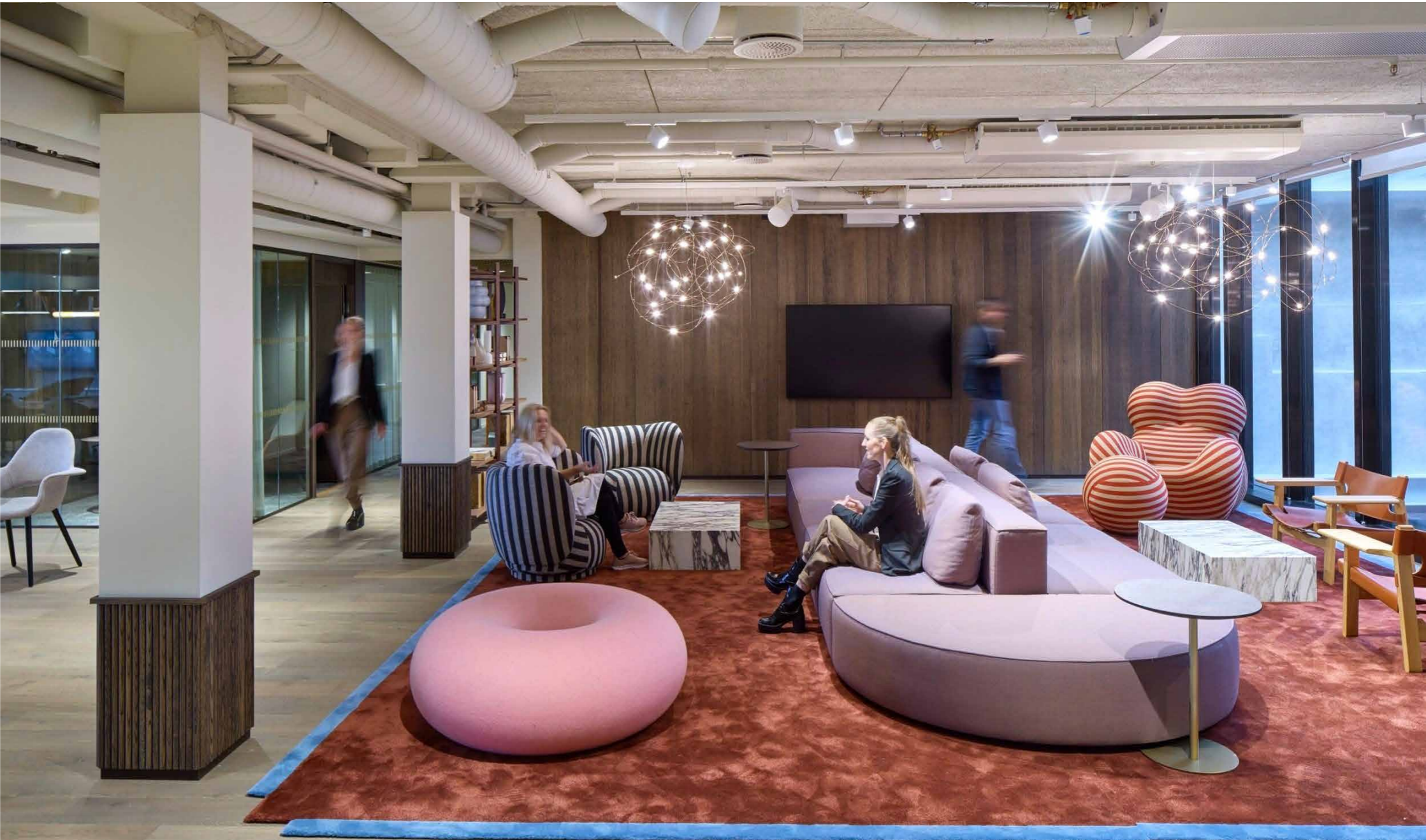
Identified areas of human rights risk in own operations

To identify EY Norway's risk of adverse human rights impacts in our own operations and supply chain, we regularly conduct due diligence in line with the OECD Guidelines and the UN Guiding Principles. When assessing risks within EY Norway's own operations, we performed a risk assessment and gap analysis in fiscal year 2023. This involved analyzing all internal governing documents and routines relevant to human rights to identify any gaps that could increase the risk of a negative impact on human rights. We regularly review this analysis to ensure that any updates in policies, routines, or other circumstances that might affect human rights are considered when evaluating our risk prioritization.

The due diligence assessment identifies that the following human rights*) are the ones where we have the highest risk of negative impact in own operation within EY in Norway:

- Right to fair and favorable working conditions (including rest, leisure and reasonable limitation of working hours)
- The right to health (physical inactivity in the working day, mental health linked to high work intensity and stress levels)
- The right not to be subjected to discrimination and harassment

*) The rights presented are based on the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights and the ILO Conventions.



Measures to reduce risk of negative impact on human rights in own operation

Many of EY Norway's measures have a positive impact across several human rights risks identified. Below we have described EY Norway's measures that address the three identified risk areas, but the actions do have overlapping impact. One example are measures to ensure fair promotions and salaries which also may prevent discrimination.

Safe working conditions

In Norway, workers' rights are protected through a combination of legislation, collective agreements, and public welfare benefits. Norway has a comprehensive welfare system that includes universal healthcare, childcare placement, free public education, and various support schemes to ensure economic security for all citizens. Additionally, employers are required to ensure the protection of employees' rights.

EY Norway's employees also benefit from a collective agreement-regulated pension system with savings and disability insurance. Additionally, EY Norway offers an extensive health insurance plan that covers employees both in the workplace and during their personal time. This insurance facilitates access to preventive care and medical treatments. To ensure the insurances available meet EY Norway's employees' needs EY Norway conducted a survey to understand which aspects of health insurance are most important to employees. The results revealed that mental health coverage is a significant priority for many staff members. In response to this feedback, EY Norway updated its employee health insurance plan in 2025 to include an increased number of sessions covered with licensed therapists.

Work intensity

The market in which EY operates means that partners and employees at times have high job intensity, high pressure and

short deadlines. This can lead to overtime work, which in turn can affect the access to enough rest and free time. EY Norway has a legal obligation to ensure that our employees do not work too long hours, get enough time off work to rest, and that overtime is compensated according to regulations. We monitor average weekly working hours and actively follow up on overtime to promote work-life balance. We also utilize the information to wisely distribute work and staff projects in due time.

As the work-intensity is very high in certain periods for different areas of our business EY Norway practices "summer-hours"; shorter working hours during the summer months with a 7-hour workday.

Health, environment and safety

Busy workdays with tight deadlines and balancing work with personal life can cause stress, potentially leading to health issues. EY Norway recognizes this and is providing employees with support and resources to manage stress effectively. EY Norway's work environment policy and plan outlines our commitment to fostering a healthy work environment and mitigating risks of work-related illnesses and injuries. This management approach is seamlessly integrated into our daily operations and systematic handling of workplace issues.

EY Norway's hybrid work model

EY's hybrid work model offers our employees flexibility in their workday and allows employees to shape their own lives to a greater extent than before. Flexibility can have a positive impact on both physical and mental health, by allowing employees to manage their own time as needed and desired, and thus be more flexible to participate in both physical and social activities. At the same time, a hybrid work model changes how managers follow up

and see their employees, and each employee also has a greater responsibility to set limits for working hours and leisure time with the risk that entails. Talent (HR) and management follow the effect of the hybrid work model closely, both for employees and the organization. Overall, the flexibility and trust are highly valued by our employees.

Ergonomics and promotion of movement

EY employees work tasks are often sedentary work. To prevent illness related to inactivity and static work EY Norway promotes breaks, variation during the day and ergonomic office setups. Our offices are designed with diverse work zones to suit various tasks, demanding either concentration or collaboration. To support physical health and a positive work environment, especially with our hybrid work model, we have equipped employees with remote workspaces with ergonomic home office gear. To encourage

physical activity, employees also have access to an app for movement reminders during breaks and most larger offices have different corporate sports initiatives or discounted work-out opportunities. Our headquarter office is in the city center close to public transportation and good facilities for parking bikes.

Mental health

We prioritize mental health at EY Norway by fostering a healthy work environment and promoting work-life balance. Our approach includes integrating stress management into performance appraisals, providing follow-up with an employee counselor, and offering counseling services. We also ensure access to insurance-covered psychological support for challenging life events and services for managing stress and daily life skills. Each year, we host themed weeks featuring webinars on mental, social, physical, and financial well-being.



Diversity, Equity and Inclusiveness

EY Norway and the Nordic region is actively working to promote gender equality at all levels of the organization. Our gender balance ratio is within our target of 40%-60% either way, at lower positions, on the board, and within the total employee population. The challenge for EY Norway lies in achieving gender balance at the Director and Partner levels. To address this, we have implemented several measures to investigate the reasons behind the lower number of female partners and to facilitate gender balance in top management as well. In addition to gender balance EY Nordics and Norway have increased focus on diversity in a broader sense, including persons with disabilities, and people from a range of cultural and professional backgrounds. In 2025 we will release a new strategy focusing on fostering an inclusive culture, gender focus, and being a leading voice in all we do, with clear methods and actions to accelerate progress.

EY Norway's activities to prevent discrimination and promote fair working conditions are a combination of annual recurring processes and one-off initiatives in areas where we have identified a higher risk of potential discrimination or opportunities for improvement. Below we have grouped initiatives into EY Norway's Talent processes and work-situation where risk of unfair treatment and discrimination potentially may occur.

Recruitment

We believe that we attract the best candidates for a role by having the broadest possible recruitment base. Our analyses of the recruitment process have shown that we can do more to attract a wider segment of talent and further strengthen the interview and selection process through standardization. This work aims to promote equality of opportunity for all.

Following is a selection of activities that EY Norway has undertaken in addition to or as part of established recruitment processes:

- We utilize reports that highlight the current gender balance at various rank levels within the departments across EY Norway when planning for future hires.
- In the fiscal year 2024, EY Norway began a collaboration with InClue AS to enhance our recruitment process from start to finish, with the goal of promoting a diverse workplace and preventing potential discrimination. EY Norway has worked throughout 2024 and 2025 to become certified by InClue as a Bias-Free Recruiter, achieving certification in February 2025.
- We promote gold standard interview training to ensure we conduct effective interviews. This is a skill, and through an updated course, employees gain access to training and quality questions that ensure a high-quality process. The course also addresses unconscious bias and is mandatory for interviewers in Norway to ensure unbiased selection.

Promotion

Overall, EY Norway has a good gender balance; however, at the upper levels of the organization (referred to as ranks in EY) and within the partner group, there is a predominance of men in EY Norway. We aim for a gender distribution of 40-60% either way, across the organization and continuously work to ensure equal opportunity for promotion of female leaders and partners. In the promotion process at EY Norway, we review analyses of the current gender balance and the development of employees with promotion potential. This provides a foundation for an environment where we can create opportunity for gender balance in the leadership segment this year and in the years to come.

An initiative that commenced in 2024 is coaching and support for new Senior Managers and Associate Directors. This is an extension of EY Norway's focus on Executive Onboarding for newly hired Directors and Partners. It is also a priority to ensure a balanced pool of candidates in direct recruitment of experienced hires

to ensure diversity, equity and gender balance in EY Norway's upper ranks and leadership, and successful onboarding of new candidates is crucial for their long-term success at EY Norway. Dedicated teams with defined roles have been assembled to support new hires in succeeding at EY Norway.





Equal pay

EY Norway is committed to equal pay for equal work and actively works to eliminate pay disparities between genders, with our compensation policy including guidelines for equal pay. To ensure gender balance, we conduct two analyses of salary levels annually: one prior to the salary review process and one immediately after. Any identified pay gaps are assessed, and if necessary, justifications for the gaps must be provided, or the gaps must be closed. In the last two fiscal years, additional preparations and analyses have been conducted to prepare the organization for the EU's Pay and Transparency Directive, which will come into effect in 2026. The status of equal pay at EY Norway is detailed in our Annual report every year, the latest on page 48 of the Annual and Sustainability Report 2023/2024.

Work-life balance

Our surveys have revealed that returning from parental leave and balancing family life with work can be challenging. We want EY Norway's employees to have time to find a balance with new daily routines. In addition to the flexibility offered through our hybrid work model, employees will have the opportunity to work 32-hour weeks for the first two months with full pay after returning from leave. This, combined with Family Transition Coaching, is an initiative to ease the challenge of balancing work and family life.

Accommodation

EY Norway operates on a highly flexible work model based on trust. Each employee, in consultation with their team and immediate supervisor, determines whether it is most appropriate to work from the client's office, EY's offices, home, or elsewhere. We have digital platforms that support a high degree of flexibility. Most of our offices have an activity-based concept with various types of workspaces and most adjustable workstations. The goal is for as many as possible to find a workspace that suits the work they perform, and the "standard solution" is a broad selection of sitting areas. Several meeting rooms are equipped with hearing loops, and we have digital tools to assist in creating presentations and documents that are more accessible for individuals with visual impairments or who require aids to read documents.

At the same time, we are a workplace with over 2 000 employees, and many may require accommodations, whether for their workspace or work hours, permanently or temporarily. The need for accommodations is addressed with the personnel manager for the individual concerned, and Talent, along with necessary functions, finds a solution for each employee with reduced functionality or other accommodation needs.

Development opportunities

EY globally and in Norway continuously view investment in our employees' knowledge and development as essential to our business. We consider this necessary to ensure the best assistance with updated expertise and offerings to our clients.

There is ongoing knowledge development for our employees through work experience, mentoring, and responsibility on projects. Further education and training occur in accordance with established programs and are tailored to the individual's area of expertise and job level. Initiatives for employee skill development are governed by the EY Global Learning Policy and supplemented with local requirements where necessary. Processes and activities are tailored for employees at EY Norway, for example, through universal design of e-learning programs. Regarding internal courses, training, and webinars, we continuously work on improvements to ensure that these arenas are accessible and accommodating for all our employees, including colleagues with hearing or visual impairments.

All employees and partners should have access to the same training opportunities. At the same time, EY Norway consciously and strategically works to create space and connections for individuals and groups who may face additional potential barriers that are not present for others, so that they have an equal opportunity to dare to take on greater challenges and responsibilities. To promote more female leaders at EY Norway, we have a Nordic sponsorship program for that purpose. Similar sponsorship programs are also offered to young talents in EY Norway. The role of the sponsor is to support the career journey of the younger talents by assisting, being a conversation partner, and motivating and nominating them for important and developmental leadership tasks.

Measures against violence and harassment in the workplace

At EY Norway, we have a zero-tolerance policy for unethical behavior, including discrimination and harassment of any kind. Our culture and core values are built on our shared principles, where respect, courtesy, and professionalism are central, and we systematically work against discrimination, bullying, and harassment. To ensure that potential cases of discrimination and harassment are reported, we regularly communicate our policies both in writing and verbally.

Status on planned measures for EY Norway's own operation in 2024

Measure	Goal 2023/2024	Status 2025
<p>Raise awareness of "unconscious bias" throughout the recruitment process</p>	<p>EY Norway regularly recruits new employees, and there is always an inherent risk of discrimination in recruitment processes. In 2024, we set a goal to track and follow up those employees participating in recruitment has completed courses in interview techniques and our unconscious bias training.</p>	<p>EY Norway is now able to track the data of completion of our unconscious bias trainings. The goal of this measure is to prevent any recruiters of not having completed our unconscious bias training, and to keep track of when employees should re-take the training to keep the learning fresh in memory when recruiting new colleagues. In addition, EY Norway has received a certification from InClue, meaning that EY Norway's recruitment process meets InClue's standards for bias-free recruitment. The certification gives EY encouragement that our efforts working towards inclusive and bias-free recruitment is showing results in line with our expectations.</p>
<p>Assessment of whistleblowing channel</p>	<p>To ensure that EY's whistleblowing channels are known to everyone and is perceived as safe, EY Nordics included follow-up of EY's Ethics Hotline in the People Pulse survey spring 2024. The question that has been put to employees is the extent to which they would use Ethics hotline and the extent to which they believe that reporting is safe considering that the case is handled impartially and that they do not risk of reprisals. Based on the responses, the necessary measures will be taken during financial year 2025 to enhance knowledge about the tool.</p>	<p>The result of the survey showed similar results cross Nordics, with smaller local differences. Overall, EY employees in Norway feel safe to report in one way or another any incidents of discrimination, harassment of other concerns related to EY Code of Conduct. But we also saw that we should increase awareness of EY's Ethics hotline and the established process to handle any reported cases. Following this result EY Nordic Talent has published news article to employees on the topic and enhanced this information in EY Nordics and Norwegian onboarding material.</p>
<p>Routines for better documentation and assessment of established activities and routines</p>	<p>EY Talent has many established and effective measures to ensure employees' work environment, well-being, development, and safety at work. We will strengthen the documentation of the measures we implement and evaluate their effectiveness. The aim is to ensure that we focus our efforts on the measures that have the best impact and positive results while minimizing the risk of negative effects. EY Norway and the Nordic region have adopted "EY Equal" to map all activities related to anti-discrimination measures and promotion of diversity, equity and inclusiveness.</p>	<p>EY Norway has an established process to review activities and status of conduction in Equal with responsible HR teams and with this strengthened documentation of the work we do.</p>



Respecting human rights in EY Norway's supply chain

Anchoring responsibility – policies and processes

EY's Supplier Code of Conduct sets forth the minimum standards of business conduct that we expect from all of our suppliers and includes commitments to respect human rights. Paragraphs 3.1 to 3.12 describes EY's demand on Human rights and we expect that policies should be in place to confirm the supplier's commitment to points 3.1–3.12, and improvement programs should be in place where relevant. By signing EY's General Terms and Conditions, the supplier agrees to abide by EY's Supplier Code of Conduct in its delivery to EY. As part of our efforts to comply with the requirements of the Transparency Act, the due diligence process in the supply chain is strengthened at a Nordic and Norwegian level, in collaboration with EY Global.

Our general policies and commitments to protect human rights in EY's supply chain:

- [EY Global Supplier Code of Conduct](#)
- [EY's general terms and conditions \(Nordic version\)](#)
- [EY Global Procurement Policy \(internal policy\)](#)

All EY personnel must follow the "Global Procurement and Supply Chain Policy" for any purchase, regardless of size. Contracts with suppliers must include compliance with the EY Supplier Code of Conduct or equivalent policy. For technology, travel, HR, brand marketing, and communication purchases, Global Supply Chain Services must be involved, regardless of price. For workplace services, the threshold is USD50,000.

EY Global Supply Chain Services

EY Global Supply Chain Services (SCS) is organized at a global level with dedicated regional contacts for primary procurement areas. EY holds contracts at a global, regional and local level, depending on the product or service sourced. The EY Procurement Environment, Social and Governance Services (ESGS) team is responsible for ESG topics throughout SCS. Sourcing managers are regularly provided with training sessions to facilitate responsible sourcing, and in fiscal year 2024 all supply chain professionals were required to complete online Sustainable Procurement training with concepts applicable to human rights such as supplier due diligence. 94% of all EY SCS staff have completed this training.

As part of the procurement process involving EY Global SCS due diligence is conducted on potential suppliers when suppliers are registered in our vendor system. Through the supplier assessment survey they are asked for goals, programs and policies. This initial assessment also acts as a screening process to shortlist suppliers for a deeper dive assessment conducted by EY Global Procurement's ESGS team.



Risk assessment and identified areas of human rights risk in the supply chain

EY Norway and the Nordic region carries out due diligence assessment based on the OECD's Guidelines for Responsible Business Conduct. As part of our Nordics due diligence process, we conduct risk assessments on our suppliers.

Methodology

Our methodology for conducting supplier risk assessments is grounded in the recommendations of the OECD Guidelines. The risk assessments focus on risks associated with various factors, including country, sector, product, and raw materials. We also emphasize suppliers where our expenditures are high and thus our potential impact may be more significant.

Further, EY Nordics have utilized internal information to review EY companies from which we purchase services. Within the EY Global network, we have better access to contacts and detailed information on policies and controls in place to ensure respect for worker rights and conditions for EY member firm's employees.

The external suppliers identified as having a higher risk of negatively affecting human rights based on the initial assessment, are also assessed based on the maturity of their human rights practices. This evaluation involves reviewing publicly available documents, such as those on their websites, and conducting media searches.

EY Nordics vendors in sectors with higher human rights risks are divided into two groups based on spend. External suppliers with expenditure above USD500,000 are assessed and followed up by EY Global Supply Chain Services and the ESGS team, with information shared with the Nordic sustainability team. Suppliers identified as higher risk below USD500,000 are followed up by EY Nordics or by individual Nordic countries only where the agreement is country-based.

EY Norway's suppliers in sectors with higher human rights risks have remained consistent due to no significant changes in purchased services or products. This year's updated Nordic supplier risk assessment focuses on hospitality sector suppliers, as detailed below. Hospitality sector suppliers typically have expenditures under USD500,000, making them a key area for local due diligence, unlike larger technology and IT suppliers monitored by Global Procurement.

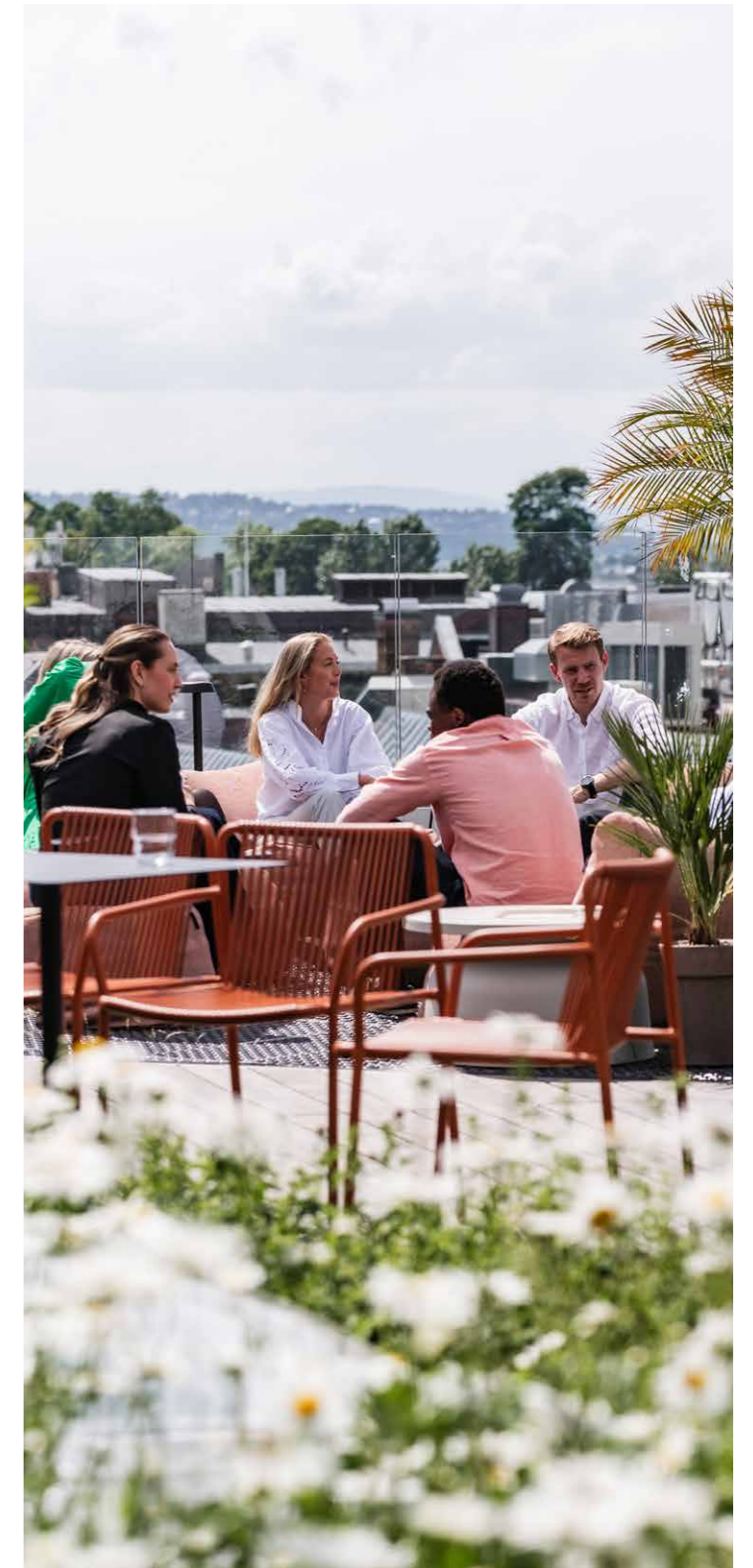
EY Global Procurement ESG Due Diligence program

EY's Global Procurement ESG due diligence program with suppliers is managed by EY Global ESGS team. The Nordic Human Rights Due Diligence of suppliers is an addition to and in collaboration with the global program to ensure that we also properly detect and address risks that concern EY Norway and Nordics. The global program falls into the following five areas:

- To map potential risks at our suppliers overall and per product or service, EY Global Procurement have used the EY ESG Risk Tool. Based in this, they developed the **Sustainable Sourcing Framework** – a practical guide for sourcing managers on how to approach ESG including supplier selection and request for proposal (RFP) questions. There is a core set of RFP questions noted which should be asked no matter the product or service and then additional questions that can be asked for specific products or services (based on the risks identified in the ESG Risk Tool).
- Just as EY's Global Code of Conduct outlines ethical standards for every EY individual, the Supplier Code of Conduct establishes similar expectations for EY suppliers. To monitor the adherence with the **EY Supplier Code of Conduct**, EY Global ESGS team have previously tracked strategic contracts and are still exploring ways to enhance this process. They have not yet detected any serious violations against the EY Supplier Code, nor incidents related to anticorruption or bribery. If any

issues are identified, EY Global SCS will collaborate with the supplier to address these and develop an effective remediation plan.

- EY SCS survey suppliers whilst they're being **onboarded** to understand their goals, programs and policies. This acts as a screening process to shortlist suppliers for a deeper dive assessment.
- EY Global ESGS use **deep dive due diligence** to have a more accurate understanding of the ESG impacts of our suppliers and to verify if they're adhering to the Supplier Code of Conduct. In 2022 they carried out an assessment pilot with 71 high-risk, high spend suppliers globally and in 2024 they invited a further 250+ suppliers to take part. And in 2025 they have extended the assessment to more suppliers. The selection of Nordic suppliers is aligned with EY Nordics and any follow-up is coordinated. Suppliers responded to questions about their policies, programs and impacts across ESG, human rights and DE&I and we will work with them to encourage improvements.
- Based on local supplier responses in the ESG assessment, **follow-up** will be coordinated with local ESG teams and any follow up of Norwegian or Nordic suppliers will take place through close vendor relationships and dialogue. EY Global Procurement will follow up with other vendors as needed. For scores below 33%, a video call will be set up to discuss planned actions. For scores between 33% and 65%, we'll request an update on progress. Vendors scoring above 66% will receive an email thanking them for their efforts and participation.



Identified areas of risks in EY's supply chain

EY Norway's suppliers are mainly located in Norway or in the Nordic region, thus the risk of human rights violations is generally lower. However, the risk of human rights violations increases when examining suppliers' industries and raw materials included in the product. Based on the risk assessments and follow-ups conducted over the past three years, the sectors with the highest inherent risks concerning human and labor rights for EY in the Nordics are:

- Technology and IT
- Facility services (e.g., office facilities, cleaning, canteen/catering)
- Construction industry
- Event and entertainment industry
- Hospitality sector

In the Nordic context we have put additional focus on the hospitality sector this year, due to the inherent risk of negative impact on the labor rights of workers.

Purchasing products: technology and IT products

For suppliers of IT products (mobile phones, computers and other types of IT equipment and hardware) in general, there is a high risk of negative impact on human rights related to assembly of products and production of components. The factories where IT products are assembled and manufactured are largely located in Asian countries where human rights violations occur more frequently. Risks are particularly related to violations of the right to a living wage, forced overtime, short-term contracts and the right to form and join trade unions. Furthermore, there are risks related to health and safety, as the production of electronics requires the handling of many hazardous chemicals. Lack of

personal protective equipment and inadequate health and safety training further increase the risk of rights violations. Raw materials used in IT products and mobile phones include metals and minerals. The extraction of raw materials takes place globally and often in countries associated with weakened governance and human rights violations. Risks related to the extraction of raw materials in several countries relate to rights such as fair and favorable working conditions, the right to health and safety, the right not to be subjected to child labor and forced labor.

Procurement of services: cleaning & services, construction, event & entertainment and hospitality sector

We have suppliers who provide services to us such as the operation of canteens, cleaning of offices, events and the construction industry. The latter is associated with the development of new EY offices. These industries are known for potentially having a large proportion of workers representing more vulnerable groups (e.g. workers who are young, unskilled, temporary workers or foreign workers). These groups are at risk of having less knowledge about the rights to which they are entitled, making them extra vulnerable to exploitation.

For suppliers of cleaning services, catering/canteen, events/entertainment and the construction industry, we collectively find a potential risk of negative impact on rights related to fair and good working conditions, including low wages, withholding of wages, illegal work, short-term contracts, lack of overtime pay, high work pressure and social dumping. Other risks are discrimination and sexual harassment, as well as the right to health and safety in connection with stressful physical work, work at heights and lack of HSE measures.

Furthermore, we find additional risks of negative human rights impacts when examining the raw materials included in the products of our service providers. For example, for some food products such as coffee, tea, cocoa and sugar, there is a very high risk of human rights violations further out in the supply chain. There is also potential health risks associated with chemicals used in the production of cleaning products and, not least, high risks related to raw materials such as metal and wood (medium risk), which are used by our suppliers' subcontractors in the construction industry.

In the context of EY's operations, employees frequently engage with the hospitality sector for a variety of services. The hospitality sector encompasses a wide range of services, including accommodation, catering, event management, and travel arrangements, all of which are integral to facilitating business travel, client meetings, and corporate events. As EY employees travel for work, they rely on hotels, restaurants, and other hospitality providers. The hospitality sector is inherently at risk of negative impacts on human rights and labor rights such as exploitation of vulnerable groups like young or migrant workers, wage disparities, and inadequate working conditions. Additionally, the fast-paced nature of the industry often results in high turnover rates and precarious employment, further complicating the protection of workers' rights.

The risk mapping reveals a range of rights where there is a potential risk of negative impact in EY Norway and Nordics' supply chain, from industry risks to the raw material extraction itself, as the final link in the supply chain.

The risk assessment as part of our due diligence routines in EY Nordics, identifies the following human rights to have the highest inherent risk of negative impact in EY Norway and Nordics' supply chain:

- Right to fair and favorable working conditions (fair wages, a decent living wage, safe and healthy working conditions, rest, leisure and reasonable limitation of working hours, holidays, etc.)
- Right not to be subjected to discrimination and sexual harassment
- The right to freedom of association with others, and to form and join trade unions
- Right to assembly and freedom of association
- Right to an adequate standard of living
- Right to health and safety
- Minorities and indigenous peoples' rights
- The right to clean drinking water and sanitation
- Right not to be subjected to forced labor
- Right not to be trafficked
- Right to freedom of movement
- Right not to be subjected to child labor
- The rights of all migrant workers and members of their families

Identified risks and status of human rights with EY service partners

EY Norway collaborates with and purchase services from the global EY member firm network, including EY's service centers. A material portion of EY Norway's services are supported by global teams who combine broad technical knowledge with a focus on innovation, automation and process improvement.

For EY member firms EY Norway has taken into account the human rights risks that are considered material for our industry and local country risks to assess if EY Nordics and Norway have enough information, proper governance and mitigating factors in place to ensure good working conditions on our projects, and if any improvements should be done to strengthen Nordics' contribution to uphold rights of EY employees providing services to our projects.

The due diligence assessment identifies that the following human rights^{*)} are the ones where we have the highest inherent risk of negative impact through our service collaboration with EY member firms:

- The right to fair and good working conditions (fair wages, a decent living wage, safe and healthy working conditions, rest, leisure time and reasonable limitation of working hours, holidays, etc.)
- The right to health (physical inactivity in the working day, mental health related to high work intensity and stress levels)
- The right not to be subjected to discrimination and harassment
- Right to assembly and freedom of association

^{*)} The rights presented are based on the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights and the ILO Conventions

The identified risks are based on established country and industry risks, media attention and stakeholder feedback. It is assessed that there is a greater inherent risk of violations against human rights in countries with weaker regulations of worker rights and prevention of discrimination. For these countries EY Global' s Code of Conduct and internal policies and processes (as referenced below) play an even more important role to safeguard worker rights of EY employees.

All EY member firms, share the same global strategy, set of values and commit to perform work according to [EY Global Code of Conduct](#). EY member firms also utilize the same whistleblower system, EY Ethics hotline, with a commitment to protecting any whistleblower and prevent retaliation. EY Nordics Ethics board is notified and included in cases raised that concern the Nordics operation or any of the Nordic member firms.

There is also a cultural aspect to bear in mind when one work in cross-country teams to ensure expectations and scope are understood by all parties. During the last year EY Nordics have received feedback that highlighted the need for cultural awareness and the need to clarify expectation and scopes in more detail as messages from leaders were perceived differently based on cultural context.

EY Norway considers that the risk of violations against human rights in EY's network of member firms is low. At the same time there are areas where we can improve, and given the feedback we have received we have planned Nordic actions in addition to the already established global routines for 2025.





Status on measures to reduce the risk of negative impact on human rights in the supply chain planned in 2024

Measure	Goal 2023/2024	Status 2025
Control system for Supplier Code of Conduct	Continue the work to ensure local control of Supplier Code of Conduct, signing and follow-up of compliance for risk industries.	EY Global Procurement has improved control measures and reports for all purchases above USD50 000 – with contracts. EY Nordics will continue efforts to get better reports of these measures.
Follow up of local suppliers	EY Norway and EY Nordics will continue to implement regular risk assessments and follow up on our largest suppliers who score medium or high on risk based on country, industry and maturity in working with human rights. The work will take place in collaboration with EY Global Supply Chain and established supplier contacts.	On the Nordic level the focus of this years updated supplier risk assessment has been on suppliers from the hospitality sector due to industry risks and EY's frequent use of these services.
Supplier selection courses	EY Norway and EY Nordics will continue to communicate EY's Global Procurement Policy internally and provide guidance on the requirements for purchases made on behalf of EY. The purpose is to ensure that EY Nordics' employees comply with procurement requirements and prevent the risk of violating laws and guidelines, including those related to human rights.	On a Nordic level we have communicated to guide EY coworkers to the right information and policies when purchasing on behalf of EY. EY Global has hosted a week of ESG in procurement which is training of procurement personnel in ESG and their responsibility.
EY member firms	EY Norway has set a goal to more closely follow up on the Nordic agreements with EY service centers to better identify Norwegian initiatives that promote good collaboration in the teams we work with.	The last year we have been in dialog with general councils and relevant stakeholders in EY Global to confirm that EY policies and processes are complied with and to learn if the member firms have any concerns from their point of view. Their response confirms our assessment that EY policies and processes reduce risks of human rights violations.

Further work and measures to safeguard human rights

In EY Norway together with EY Nordics we will continue with the practice we have in place and a mindset of continuous improvement to safeguard human rights in EY Norway’s own operation and supply chain. We will join efforts with the global team and other EY member firms to ensure we use the leverage EY can have to inspire responsibility and accountability for human rights.

Initiatives in Own Operations

Action	Description
Resources to prevent sick leave	EY Norway plan to engage a third party to support preventive measures to prevent sick leave. The intention is to give partners and employees tools/measures to detect and address risk factors for sick leave and thus prevent people from falling out of work.
Accredited stress-coaching	Upskill EY coaches to accredited stress coaches. Across Nordics 9 coaches will be certified in 2025.
Steering committee on DE&I in Norway	There has been established a steering committee for diversity, equity and inclusiveness in Norway to strengthen EY Norway’s work with the wider agenda – including, but not limited to, culture, neurodiversity and disability.
Nordic Neuro Diversity Group	Resource group for Neuro diversity established on a Nordic level to strengthen awareness and improve inclusion.
Training – stress resilience	Stress resilience presentation and training for EY teams in Norway with the intention to make employees aware of stress triggers in their life and strengthen their resilience to handle periods of stress.

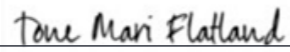
Initiatives towards EY’s Supply Chain

Action	Description
Follow up of identified risk suppliers	We will further follow up selected suppliers that are identified as medium or high risk among targeted sectors. 10 high spend vendors are included in EY Global’s assessment Q2 2025; further EY Nordics will have four vendors. The goal of the follow up is to learn how our closest vendors work to safeguard human rights and ensure they are in line with our expectations regarding human and labor rights.
Better access to data on supplier contracts and Code of Conductcommitment	Improve accessibility to reports and status of EY supplier relationships.
Human Rights in real estate projects	Relocation projects and office rent is a big investment for EY Globally and for EY in Norway. Thus, EY Nordics want to ensure that expectations to human rights always is included in initial conversations and agreements with potential/future landlords and included in planning of and building of new offices.
Improve dialog and clarify expectations with EY member firm teams from other countries.	Review service agreements to ensure that EY Nordics expectations to service delivery; scope and deadlines are clear and set routines that ensure that we are aware of and can respect workers local public holidays and time off.

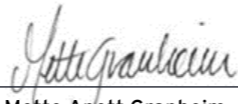
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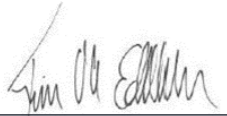
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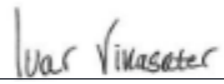
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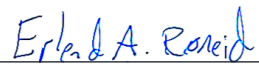
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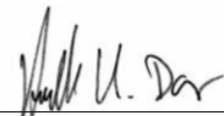
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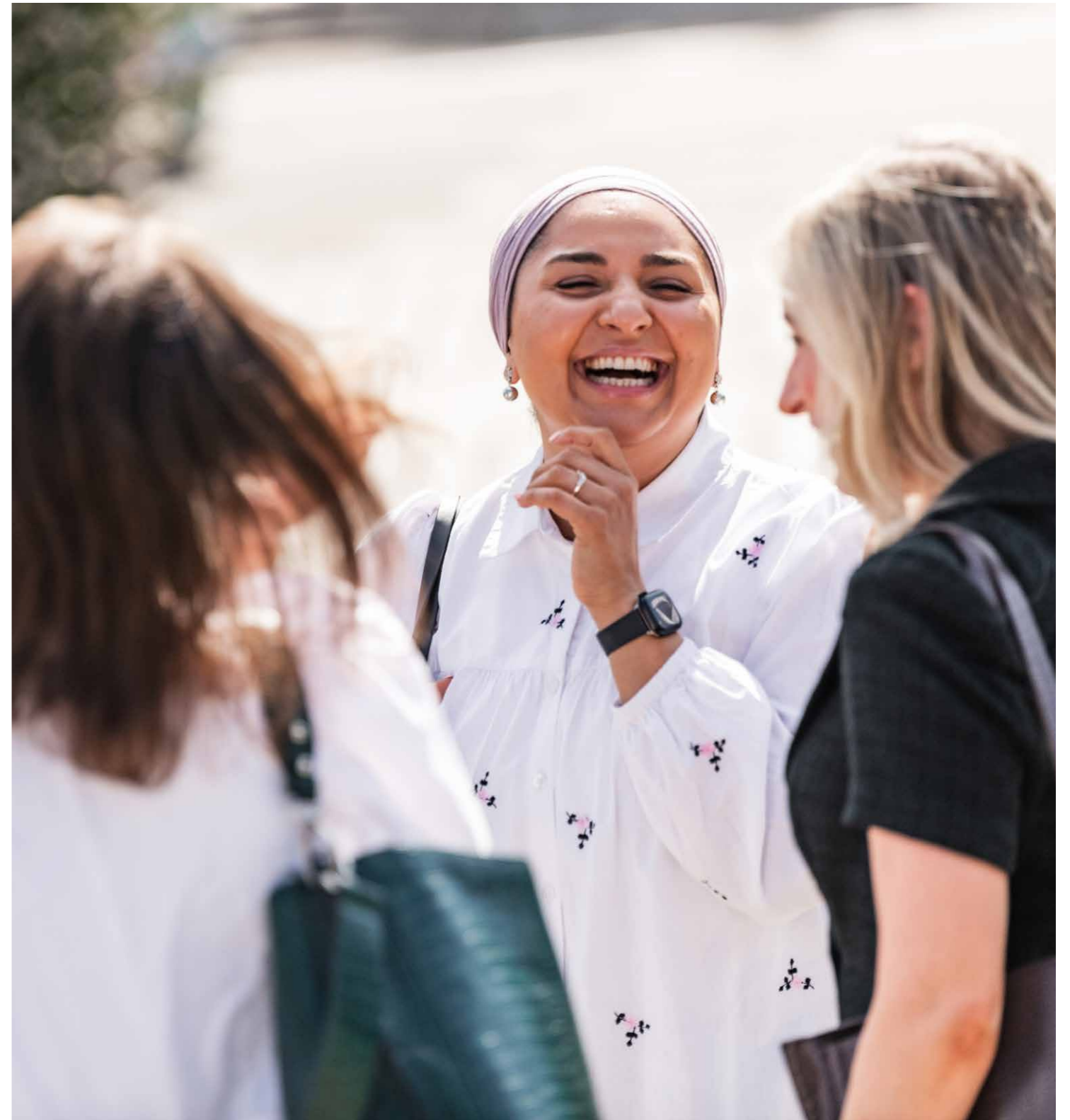
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