

The Transparency Act

Benteler Automotive Raufoss AS.

1) The Company, operations, and accountability.

Benteler Automotive Raufoss ("**BAR**") is an automotive supplier and is situated in Raufoss, Norway. The BAR's line of business includes the manufacturing of automotive parts. The BAR is a subsidiary of Benteler International AG and part of the BENTELER Group (the "**Group**"). The Head Quarter ("**HQ**") of the Group is situated in Salzburg in Austria. In 2024 the Group employed more than 20.000 people at 90 locations in multiple countries.

The BAR's automotive industry is served with sales, development, and production in Norway, Sweden, Germany, and the Czech Republic, and the technological center of gravity for aluminum production is at Raufoss.

The purchasing department as part of the BENTELER Automotive organization assists BAR with purchasing, including assessment and approval of suppliers based on established routines and systems for orders. In order to assess which suppliers are preferred for different deliveries, Group has a "Supplier Code of Conduct", and standard contractual clauses, which oblige the suppliers to *comply with human rights and decent work conditions*.

In 2024 the revenue in Raufoss was NOK 2,5 billion, a balance sheet total of NOK 1,3 billion, and BAR employed 500 people. This means that BAR is considered as a "larger business" and is subject to the Transparency Act and the work with Fundamental Human Rights and Decent Working conditions (Transparency Act, cf. Section 3).

2) Due diligence

2.1 Supplier mapping

Goods and services purchased by the BAR can be divided into the following two main categories:

- A) *Direct costs*: goods and services that includes in our final products
- B) *Indirect costs*: goods and services that is not part of the value chain

These two main categories are again divided into several subgroups. The most relevant are:

- A) *Direct costs*:
 - Raw materials
Norwegian and Central European companies

- Direct components
 1. Norwegian, Scandinavian, and Central European companies
 2. Southern European, Asian, and Indian companies

B) Indirect costs:

- Logistics
 1. Norwegian and Central European companies
 2. Eastern European and international businesses
- Maintenance
 1. Norwegian, and Central European companies
 2. Southern European and U.S. companies
- Consumption
 1. Various international companies
 2. Major part of Norwegian, Scandinavian, and Central European companies
 3. Some Asian companies

The review and mapping of suppliers shows that the BAR has used a total of approximately 580 suppliers over the past years. Some of those suppliers are covering areas like IT software, financial services, and rental facilities.

2.2 Risk Assessment

2.2.1 Initial assessment of risk

BAR first undertook an overall categorization of risk for actual and potential negative consequences for basic human rights and decent working conditions. The first assessment was mainly made with background on where the relevant suppliers were located (country/region) and type of delivery that suppliers deliver to the BAR. Areas/countries were classified on a risk scale from 1 to 4 and goods/services were classified on a scale from 1 to 3. This assessment led to a 'risk factor' on a scale from green (low risk), yellow (moderate risk), orange (high risk), red (very high risk).

The list of suppliers also includes Nordic and European supplier that are subject to the Transparency Act. The BAR assesses the risk of actual and potential negative consequences for basic human rights and decent working conditions as *low* for the Nordic and European supplier. The BAR has not identified any known nor specific risk factors by these suppliers that indicate increased risk.

Suppliers located in Eastern Europe, Middle East, and USA were assessed as *moderate risk*.

Finally, suppliers located in India, China, and Far East were rated as *high risk*. The BAR considers that the risk of actual and potential negative consequences mainly relates to working conditions and discrimination.

It is not considered to exist, for any of the suppliers, a *very high risk* of actual and potential negative implications for fundamental human rights and decent working conditions.

BENTELER is using various notification channels and complaint mechanisms to make deviations regarding human-, labor rights and environmental protection transparent. This includes the BENTELER Code of Conduct as internal guideline as well as our Supplier Code of Conduct.

Therefore, the BENTELER Group established a Whistleblower Tool which is available via the company's homepage as well as a risk management tool. In addition, the BENTELER organization performs recurrent and on demand supplier audits.

2.2.2 Further assessment of risk

Based on the initial risk assessment, BAR decided to do an in dept analysis of the suppliers assessed as moderate and high risk. The purpose of the in dept analysis is to find out about how the supplier ensures compliance with fundamental human rights and decent working conditions. The result from the in dept analysis is as follows:

- Low risk, 91% of suppliers

From Nordic countries, Germany, United Kingdom, Ireland, Austria, Swiss, Netherlands, France

- Large, known companies who are usually certified according to ISO, DIN, and VDMA norms.
- Known these companies over several years.
- Regular contact, visits, and meetings

- Moderate risk, 8% of suppliers

From South and Eastern Europe, Middle East, USA,

- Moderate risk of deviations regarding OECD Guidelines for Multinational Enterprises, ILO, UN, CPI
Efforts to track these suppliers is higher because of less physical visits at the supplier locations.

- High risk, 1% of suppliers

From India, China, and Far East

- Higher risk of deviations regarding OECD Guidelines for Multinational Enterprises, ILO, UN, CPI

- Communicating via the web
 - Efforts to track these suppliers are higher because of less physical visits at the supplier and media monitoring is a challenge.
- Very high risk, 0% of suppliers

2.3 Prioritization and planned measures

Based on the risk assessment described above, BAR's assessment is, that in general and overall, the risk of violations of fundamental human rights and decent working conditions in the supply chain and among business partners is mainly low. This is assumed to be since the Group and the BAR have already established systems and routines to ensure serious and responsible suppliers.

No specific violations or a very high risk of breaches have been identified that could require larger and more intrusive measures. Regarding prioritization and proportionality, BAR does not consider that measures are required for those suppliers where the risk is assessed as low or moderate.

For 1% of the suppliers assessed as high risk, BAR believes that the risk relates primarily to working conditions and discrimination. Based on this, the BAR has planned to implement the following measures in relation to these suppliers:

- Those suppliers, who may not have signed the Group's "Supplier Code of Conduct", are requested to sign it to be considered as serious and responsible suppliers by the Group and BAR. If suppliers' Code of Conduct complies with the Group's Supplier Code of Conduct, this will be sufficient as well.
- Suppliers will be required to report annually (deadline June 1st each year) about HSE (health, safety, and environment), working hours, wages, etc.
- The Supplier Audit Team (Production Materials) / the commodities in the Group will carry out an audit of the suppliers and will follow up any identified deviations.
- Identified high-risk suppliers are or will be tracked within Groups risk management tool. These suppliers will be tracked on incident level as well as via media monitoring; checking local news, social media, etc. This tracking takes place on a daily basis and the respective Procurement Commodity Manager will receive message out of the system directly.


The measures will be followed up within Procurement in compliance with Section 4 first paragraph (d) to (f) of the Transparency Act for the relevant supplier. This report will regularly be updated, when necessary, but at least once a year. The report will be updated and published no later than June 30 each year.

With the established process, methods, and tools we are mitigating the risks starting in the onboarding process and within the ongoing cooperation with our suppliers. Until starting the risk management tool, we have tracked 2933 incident alerts and 1299 media monitoring screenings in the group, BAR was affected by none of them.

Initially we established a Supply Due Diligence Committee. On a regular basis internal and external cases are discussed and decided how to proceed.

With the achieved transparency we are very confident to fulfil the Norwegian Transparency Act.

Raufoss, June 17, 2025




Jaroslav Leibl
Chairman of the board

Sindre Ensrud

Sindre Ensrud
Board member

R. Bardini

Roxana Bardini
Board member

Matthias Josef Siemer
Board member

Vegar Fuglerud
Board member

Per Dale
General Manager

Radek Jedlica
VP Global Procurement BENTELER Automotive