

Fokus Elektro AS

Statement pursuant to the Transparency Act for the reporting period **30.06.2025 – 30.06.2026**

1. The Transparency Act

The Norwegian Transparency Act entered into force on 1 July 2022 and aims to reduce the risk of human rights violations and ensure decent working conditions within the company's own operations, throughout the value chain, and among business partners¹. Furthermore, the Act is intended to ensure access to information. All companies covered by the Act are required to carry out due diligence assessments and report on these annually². Amendments to the Transparency Act entered into force on 1 November 2024. The Norwegian Consumer Authority is the supervisory authority responsible for monitoring compliance with the Transparency Act³. The Act aims to:

- Increase companies' accountability and understanding of risk
- Safeguard human rights and decent working conditions throughout the entire value chain
- Integrate social considerations into business strategy
- Fundamental human rights and decent working conditions include, among other things:
 - Slavery / forced labour
 - Freedom of association and collective bargaining
 - Child labour
 - Discrimination
 - Cruel or inhumane treatment
 - Health, Safety and Environment (HSE)
 - Wages
 - Working hours
 - Regular employment
 - Housing and sanitation conditions
 - Indigenous peoples' rights
 - Community engagement

The Transparency Act is an important tool for ensuring social sustainability and supports the United Nations Sustainable Development Goals (SDGs) No. 8 and No. 12.



Figure 1 UN Sustainable Development Goals number 8 and 12⁴.

¹ Lovdata | 2024 | LOV-2021-06-18-99 | [Transparency Act](#)

² [The Norwegian Consumer Authority \(CA\) | 2026 | The Transparency Act](#)

³ [The Norwegian Consumer Authority \(CA\) | 2026 | The Consumer Authority](#)

⁴ [UN – The United Nations | Communications materials](#)

United Nations Sustainable Development Goal (SDG) No. 8 focuses on “Decent Work and Economic Growth.” Approximately half of the world’s population earns wages that are insufficient to provide a decent standard of living. Creating economic growth and generating new jobs through decent work is a prerequisite for sustainable development⁵.

United Nations Sustainable Development Goal (SDG) No. 12 focuses on “Responsible Consumption and Production.” Sustainable consumption and production are about achieving more while using fewer resources⁶.

2. Fokus Elektro

Fokus Elektro was established in 2004 and is a locally owned electrical contracting company based in Florø, Norway. Fokus Elektro provides a broad range of electrical services nationwide.

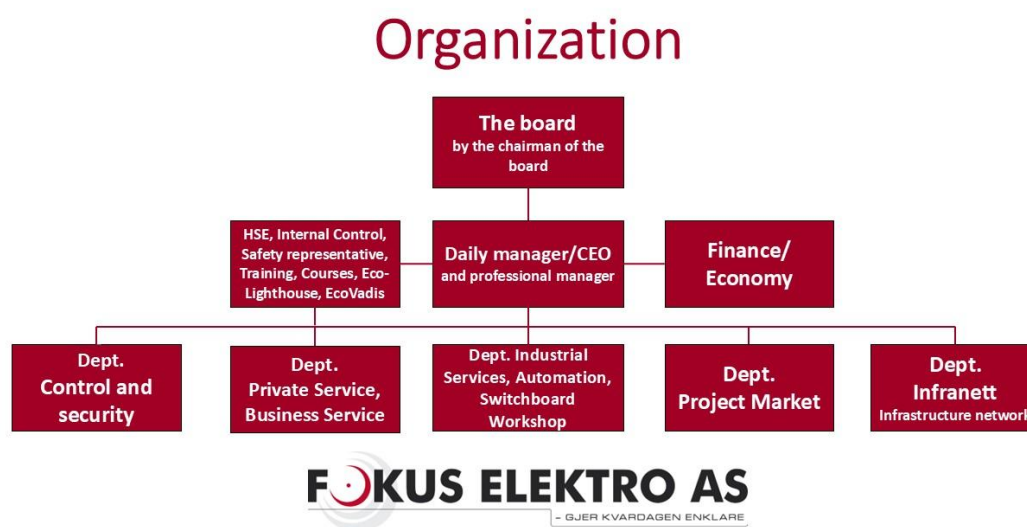


Figure 2 Organisational chart of Fokus Elektro.

The company operates across several sectors, including industry, office buildings, retail, maritime, and residential markets. We provide services such as design and engineering, installation, inspection, automation, switchboard manufacturing, telecommunications, and related services.

Fokus Elektro is subject to the Norwegian Transparency Act pursuant to Section 3 of the Act. For company information and annual financial statements, please refer to the website of the Brønnøysund Register Centre⁷.

In the following sections, we will provide a more detailed account of our approach to due diligence assessments, a brief overview of our supply chain, a description of the mapping and risk assessments carried out, an evaluation of our own operations, and finally outline Fokus Elektro’s continued work related to compliance with the Transparency Act.

3. Our Approach to Due Diligence Assessments

In recent years, Fokus Elektro has worked actively to strengthen its focus on both human rights and decent working conditions in accordance with the OECD Guidelines. This

⁵ [UN – The United Nations | Goal 8: Economic Growth – United Nations Sustainable Development](#)

⁶ [UN – The United Nations | Goal 12: Sustainable consumption and production](#)

⁷ [The Brønnøysund Register Centre | Information on organisations | FOKUS ELEKTRO AS](#)

commitment is embedded in our operations through, among other measures, our internal procedures and policies.

As part of integrating the requirements of the Norwegian Transparency Act, we have:

- Updated our Code of Conduct for suppliers
- Conducted mapping and risk assessments of our suppliers and business partners

We apply the OECD Due Diligence Process as the framework for our approach to due diligence assessments. Due diligence has been implemented as an ongoing process across all areas of our business.

Through this process, we seek to identify, prevent, mitigate, and account for actual and potential adverse impacts on human rights and decent working conditions occurring within our supply chain or among our business partners.

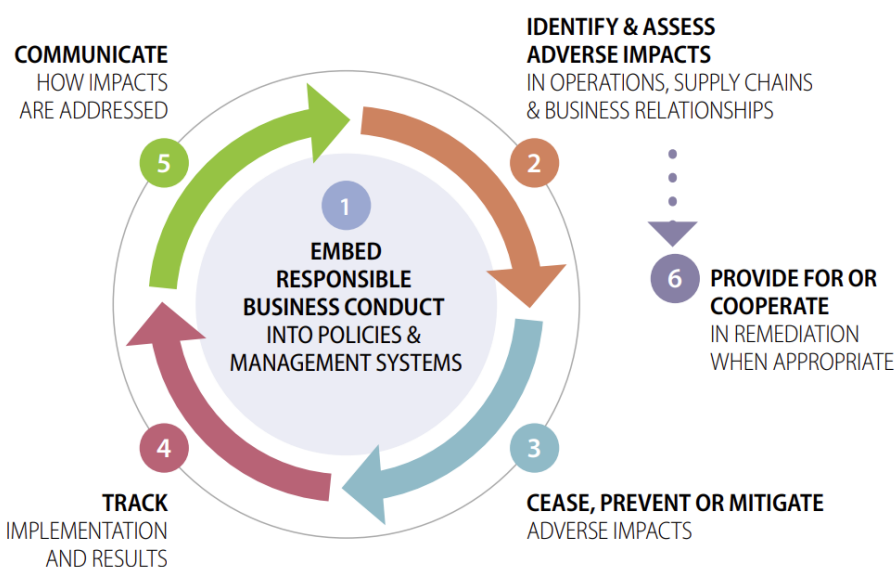


Figure 3 OECD Due Diligence Process and supporting measures, from the OECD Due Diligence Guidance for Responsible Business Conduct⁸.

4. Our Supply Chain

Our supply chain can broadly be divided into product suppliers and service providers. Approximately 90% of our material purchases are made through larger product suppliers consisting of wholesalers, distributors, and manufacturers of electrical and automation equipment. The service providers we engage primarily consist of companies supplying staffing and personnel services through the use of temporary or contracted labour. This is arranged either through other contractors or, in a limited number of cases, through authorised staffing agencies. In addition, we engage suppliers within finance, insurance, and public sector services, as well as suppliers providing consultancy and other technical services.

5. Mapping and Risk Assessment

5.1 General

Fokus Elektro conducts assessments relating to human rights and decent working conditions in accordance with the OECD Guidelines. We have classified our business relationships based on whether the parties are considered suppliers or business partners. The mapping and risk assessments we have conducted cover both our own operations as well as our suppliers and business partners (hereinafter referred to collectively as business relationships)

⁸ [OECD | 2018 | OECD Due Diligence Guidance for Responsible Business Conduct | OECD Publishing, Paris](#)

that fall within the scope of the Norwegian Transparency Act and are not considered one-off purchases.

The mapping and risk assessment of our business relationships have been carried out through classification according to the following categories:

Red – business relationships assessed as presenting a **high** level of risk

Orange – business relationships assessed as presenting a **medium** level of risk

Green – business relationships assessed as presenting a **low** level of risk

The OECD Due Diligence Guidance recommends assessing, among other factors, industry risk, geographic risk, and product risk as part of the overall risk analysis.

- **Industry risk** refers to risks that are prevalent within an industry globally due to the characteristics of the sector, its activities, products, and production processes.
- **Geographic risk** concerns conditions in a particular country that may increase the likelihood of risk within an industry, generally relating to regulatory frameworks, governance, and the socio-economic environment.
- **Product/service risk** refers to risks associated with inputs, production processes, and the delivery of services.

5.2 Mapping

5.2.1 Methodology

As part of the mapping process for 2025/2026, we assessed 97 business relationships.

We selected business relationships representing purchases exceeding 0.1% of total procurement volume. Collectively, these accounted for 96% of total purchases in 2025.

Our mapping process is based on an objective assessment of the risk of adverse impacts on human rights and decent working conditions, considering the following 5 factors:

1. Whether the business relationship has published **transparency statements that are up to date**. Practice for this vary from business to business; some businesses conduct assessments and publish statements for the financial year, while others from the annual deadline to the next annual deadline for publishing the statement.
2. Knowledge of, or **findings** relating to, circumstances that have resulted in actual adverse impacts on fundamental human rights and decent working conditions, and whether measures have been implemented to stop, prevent, or mitigate negative impacts arising from such violations
3. The **industry** in which the business relationship operates, based on data from the EU Agency for Fundamental Rights (EU FRA) report⁹
4. **The geographic locations** where the business relationship conducts substantial operations, based on data from the ITUC Global Rights Index¹⁰
5. The specific **product or service** provided, based on data from the Norwegian Agency for Public and Financial Management (DFØ) High-Risk Procurement List¹¹.

5.2.2 Changes Since the Previous Mapping / Reporting Period

In the previous mapping exercise, **geographic location** was defined and assessed based on the countries in which the company had a physical presence through offices, factories, or other facilities, regardless of the extent of activities conducted.

In this assessment, geographic location is defined and assessed based on the countries in which the business relationship conducts **substantial operations and business activities**.

⁹ [FRA – European Union Agency for Fundamental Rights | 2019 | Business-related human rights abuse reported in the EU and available remedies](#)

¹⁰ [ITUC – International Trade Union Confederation | 2025 | Global Rights Index](#)

¹¹ [DFØ - the Norwegian Agency for Public and Financial Management | 2026 | High-Risk Procurement List](#)

The reason for this change is that we consider this methodology to provide a more accurate representation of the risks associated with geographic location.

5.3 Results

5.3.1 Publication of Up-to-Date Transparency Statement

At the time of the assessment, all business relationships subject to the Transparency Act had previously published transparency statements. However, only 35 out of 57 business relationships (61%) had published up-to-date statement for the year 2025 and/or 2026.

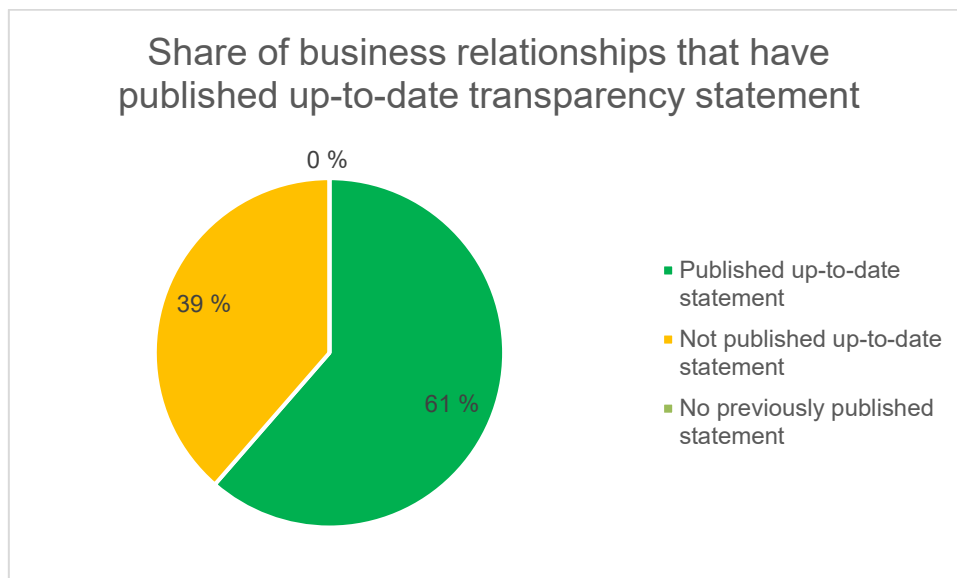


Figure 4 Share of Business Relationships That Have Published Up-to-Date Transparency Statement.

5.3.2 Findings of Actual Adverse Impacts

Three of the business relationships included in the assessment had reported findings. All findings related to breaches of decent working conditions. Measures were implemented in connection with each of the identified breaches.

	Within own operations	At business partner	At supplier	At subcontractor
Number of business relationships reporting findings	2	0	0	1

Table 1 Number of Business Relationships Reporting Findings.

1. One business relationship reported three incidents within its own operations, occurring in an overseas part of the group, consisting of one case of workplace harassment and two cases of discrimination in 2025. These cases have been followed up through the company's internal committees.
2. One business relationship reported that its employees experience harassment from customers. The business relationship stated that this is a broader industry challenge and has implemented several preventive measures, including communication initiatives directed towards customers and society at large.
3. One business relationship reported a finding at a subcontractor dating back to 2023. The finding concerned non-compliance with regulations governing overtime work. Corrective actions included follow-up of employees' employment contracts and adjustments to ensure compliance with working time regulations.

5.3.3 Industry

Most of our business relationships consist of larger wholesalers and manufacturers, while some involve temporary labour hired through other contractors and, in a limited number of cases, through authorised staffing agencies.

Of the business relationships assessed, 29 (30%) were classified as operating in industries with very high risk, 0 (0%) as high risk, 63 (65%) as medium risk, 5 (5%) as low risk, and 0 (0%) as very low risk.

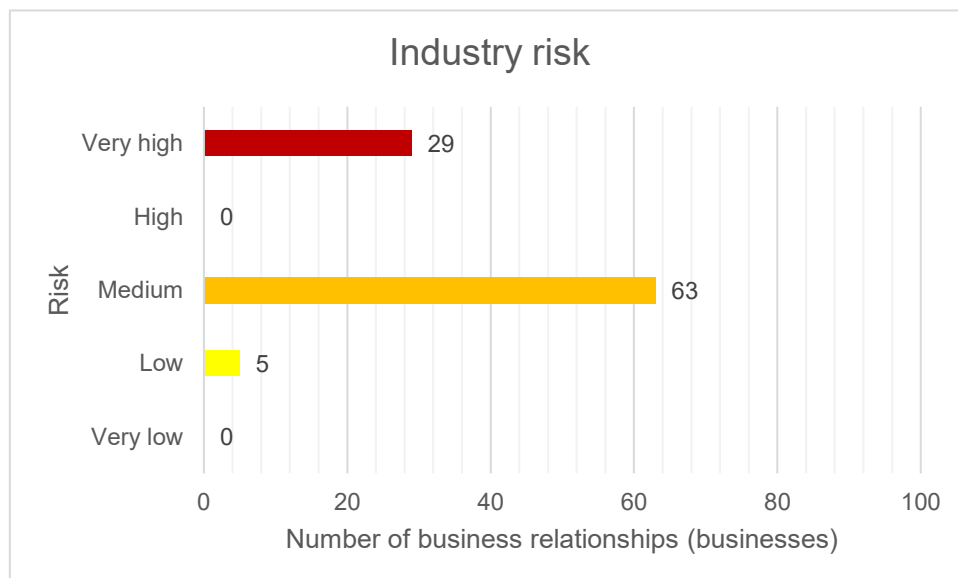


Figure 5 Industry risk – Number of Business Relationships by Risk Category.

5.3.4 Geographic Location

100% of the business relationships included in the assessment were located in Norway and maintained a physical presence through offices, facilities, or other premises. A total of 59 (61%) of the business relationships conduct substantial operations in countries classified as very low risk (ITUC rating 1), while 11 (11%) conduct substantial operations in countries classified as high risk (ITUC rating 4). None of the business relationships conduct substantial operations in countries classified as very high risk (ITUC rating 5).

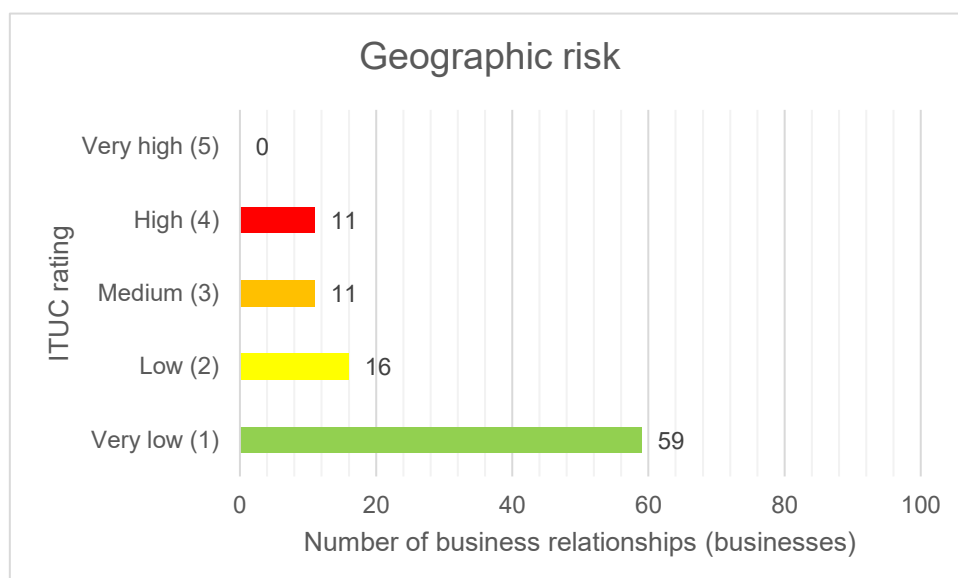


Figure 6 Geographic Risk – Number of Business Relationships by ITUC Rating.

5.3.5 Product / Service

A significant proportion of our material purchases consists of electronic products procured through larger wholesalers and manufacturers. Electronics are associated with high to very

high risk¹². Health and safety concerns are significant in the manufacturing of electronic products, which involves the handling of a large number of hazardous chemicals. There is also a high level of environmental risk associated with the extraction of raw materials and the production of components and materials. These risks are linked, among other factors, to the climate impact of the mining sector and environmental pollution resulting from metal processing, emissions of mercury, and other chemicals that contaminate soil and water resources.

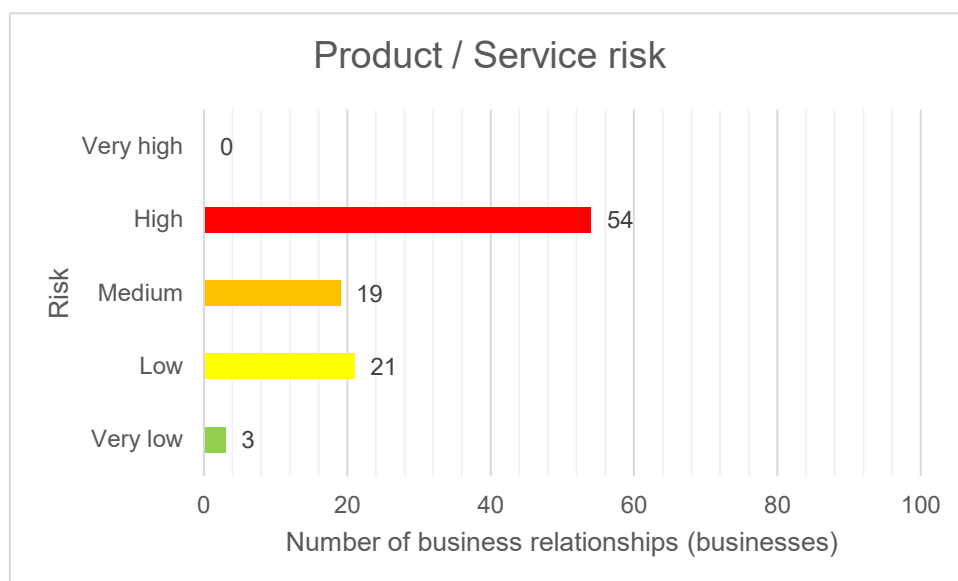


Figure 7 Product / Service Risk – Number of Business Relationships by Risk Category.

5.3.6 Overall risk

Based on the overall assessment of the business relationships within the supply chain, 1 (1%) of the business relationships was assessed as presenting a high level of risk, while 32 (33%) were assessed as presenting a medium level of risk, and 64 (66%) were assessed as presenting a low level of risk.

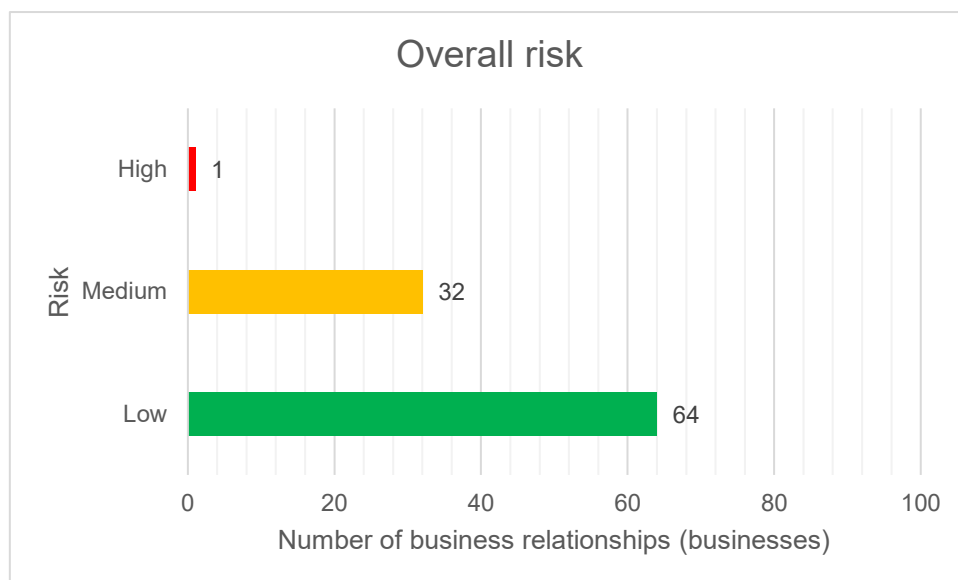


Figure 8 Overall risk – Number of Business Relationships by Risk Category;
Red (High), Orange (Medium), and Green (Low)

¹² DFØ – the Norwegian Agency for Public and Financial Management | 2021 | [Risikovurdering for brudd på menneskerettigheter i produksjon av mobiltelefoner, bærbar datamaskiner og dataskjermer](#)
Fokus Elektro AS – Statement pursuant to the Transparency Act – 30.06.2025-30.06.2026

5.4 Risk Assessment

5.4.1 Identified Risk Areas

The assessment identified that the greatest risk of adverse impacts on fundamental human rights and decent working conditions may occur within the following areas:

1. Manufacturing of electronics, automation equipment, and components produced outside the Nordic region and Europe
2. Suppliers with global subcontractor and supply chains within electronics, cables, batteries, and technical equipment
3. Temporary labour and staffing services, where risks may exist relating to wages and working conditions
4. Manufacturing of work equipment, metal products, and technical components originating from high-risk countries

This particularly applies to suppliers and manufacturers operating through extensive international value chains, including, among others, suppliers of electronics and technical components.

A lower level of risk has been assessed for business relationships operating within:

- Accounting and auditing services
- Banking and insurance
- Legal services
- Public sector entities
- Property management
- Local service contractors

These sectors are generally considered to present a low risk of adverse impacts on fundamental human rights and decent working conditions, particularly where operations are subject to Norwegian legislation and regulatory oversight.

5.5 Findings Within Our Own Operations

Fokus Elektro has not identified any findings or incidents within its own operations related to a negative working environment or violations of human rights during the reporting period and assesses the level of risk within its own operations as low.

5.6 Enquiries from Stakeholders

During this reporting period, we received and responded to six enquiries relating to our work under the Transparency Act, all of which originated from customers.

5.7 Our Procedures for Businesses Identified as High-Risk

If a high risk of violations of human rights and decent working conditions is identified within one of our business relationships, our internal procedure is as follows:

- a) Develop and plan measures to reduce the identified risk. This may include actions such as conducting on-site audits of the business relationship, requesting documentation of policies and procedures to assess how fundamental human rights and decent working conditions are safeguarded, modifying contractual arrangements, and/or maintaining closer dialogue and cooperation with the business relationship.
- b) Implement the measures determined under point a) and monitor their execution. Results shall be documented and evaluated to determine whether the measures have achieved an actual effect.
- c) Confirm that the measures have reduced the identified risk and that any adverse impact has been reduced to an acceptable level. Conduct evaluation meetings and propose improvements to prevent future risks. This may include monitoring compliance with our

requirements and standards, evaluating the effectiveness of the implemented measures, and reporting progress as well as any continued non-conformities. If the measures do not achieve the required and satisfactory results, changes to or termination of the contractual relationship will be considered.

5.8 Measures Implemented

5.8.1 General Measures

Fokus Elektro has worked over an extended period to reduce the overall risk of violations of human rights and decent working conditions and has implemented several measures to strengthen oversight of its supply chain.

Among other initiatives, our procurement strategy emphasises the use of large and well-established suppliers. This approach supports long-term supplier relationships, ensures the quality of delivered equipment, and promotes responsible production practices.

We also maintain close supervision of projects involving temporary or contracted labour.

5.8.2 Measures Implemented During the Reporting Period

To reduce risk, our company implemented the following measures during the reporting period:

2025	2026
Developed and embedded company policies, sustainability objectives, and measures across the following areas: • Labour and human rights • Environment • Procurement • Ethics These have been made publicly available through the publication of our annual Sustainability Report on our website¹³. Developed and distributed a Supplier Code of Conduct for our suppliers. Created and published internal information materials outlining employee and employer rights. Established a procurement procedure governing the selection of suppliers, as well as the procurement and leasing of products, materials, tools, workwear, chemicals, food and catering services, consumables, vehicles, equipment, and machinery. Published contact information on our website for reporting concerns and whistleblowing regarding unacceptable or unethical conditions.	Initiated the development of checklists for conducting assessments and compliance reviews of temporary staffing agencies and employment agencies.

5.9 Further work

The work of mapping and conducting risk assessments of our business relationships is an ongoing process within our organisation. In addition to monitoring existing business

¹³ Fokus Elektro AS | Sustainability | Sustainability Report

relationships, we have implemented procedures for the assessment and risk evaluation of all new business relationships through our quality management system.

Going forward, we will maintain particularly close monitoring and dialogue with those business relationships where we assess there to be a high risk of violations of human rights and/or decent working conditions.

As part of our continued efforts, we will conduct more in-depth assessments of our supply chain. We are initiating the collection of documentation from business relationships identified as high risk in order to verify compliance with our guidelines and determine whether they conduct due diligence assessments in accordance with the Transparency Act. Once the documentation process has been completed, a new risk assessment will be conducted before any further measures are considered.

We are also actively developing and implementing targeted measures for business relationships across the different risk categories. Among other initiatives, we will impose stricter requirements on staffing agencies and limit the use of labour hire services to a maximum of two suppliers.

Overall, we believe that maintaining close dialogue and active follow-up with our business relationships is an important part of ensuring accurate classification and increasing awareness and understanding of these issues throughout the value chain.

On our website, we have published contact details for reporting concerns and whistleblowing regarding unacceptable conditions. Suppliers and other stakeholders may use this channel to report concerns related to breaches of human rights and/or decent working conditions.

To report concerns regarding unacceptable conditions, please visit our website or contact us by email at post@fokuselektro.no or by phone at **+47 478 78 830**.

6. Our Group

The majority of the Group's activities are carried out through the operating company, Fokus Elektro AS. Accordingly, this company has been—and will continue to be—the primary focus of our mapping, risk assessment, and supplier follow-up activities.

Activities in the remaining parts of the Group¹⁴ can briefly be described as follows:

- **Fokushuset** – management of company-owned property
- **Florø Holding** – holding company and parent company of the Group

We will continuously assess the need for implementing specific Transparency Act follow-up measures within these companies as well.

Previously, the subsidiary Fokus Infranett, which carried out operations within electronic communications (EKOM), operated as a separate company. On 1 September 2024, it was merged into Fokus Elektro and now operates as a dedicated department within the company. See the organisational chart on page 2.

7. Our own operations

We conduct our business in accordance with Norwegian legislation, including the Norwegian Working Environment Act.

We are committed to ensuring that all employees have equal opportunities and a positive working environment. Fokus Elektro aims to contribute to a more sustainable society and therefore takes responsibility for its environmental impact, working environment, and competence development.

¹⁴ [Eierstruktur.no](https:// Eierstruktur.no) | [Eiere Fokus Elektro AS](https:// EierFokusElektro.no)

7.1 Environmental and Sustainability Responsibility

As part of managing our environmental impact, maintaining Miljøfyrtårn (Eco-Lighthouse) certification and obtaining a sustainability rating from EcoVadis are important priorities.

This means that we have established an environmental management system that governs our climate and environmental efforts and supports continuous improvement.

The Eco-Lighthouse certification¹⁵ includes specific requirements that must be met in areas such as working environment, waste management, energy consumption, procurement, and transportation. Each year, we complete a climate and environmental report that provides a clear overview of progress and opportunities for improvement.

We were initially certified in 2022 and successfully re-certified in 2025.

EcoVadis is a globally recognised sustainability assessment platform that evaluates companies' sustainability performance across four themes: environment, labour and human rights, ethics, and sustainable procurement.

We report annually and receive a sustainability rating¹⁶ based on EcoVadis' assessment. In addition, we receive feedback and benchmarking that provide insight into our sustainability performance compared with other companies within the same industry.

We were awarded the EcoVadis Bronze Medal in May 2024 and achieved the EcoVadis Silver Medal in October 2025.

Since 2021, Fokus Elektro has also been a member of Achilles StartBANK¹⁷, a shared supplier register and qualification scheme for the construction and civil engineering sector, property management, and insurance industry in Norway.

The purpose of this initiative is to promote responsible business practices, ensure fair competition, and help eliminate non-compliant operators within the industry.

We achieved Silver Supplier accreditation by Achilles in 2025.

7.2 Working Environment

To support a strong working environment, effective digital solutions have been implemented for reporting and continuous improvement within Health, Safety and Environment (HSE).

We also maintain close cooperation with our occupational health service provider Bedriftshelse¹⁸, which has, among other activities, conducted employee surveys and participates in our Working Environment Committee (AMU).

We have maintained a formal Working Environment Committee within the company since February 2023.

Fokus Elektro operates with a zero-harm vision for injuries and work-related strain. Every employee should return home from work in at least the same state of health as when they arrived.

7.3 Competence Development

Competence development is an important priority for the company, and we aim to ensure equal opportunities for professional growth and skills enhancement for all employees.

Fokus Elektro is an approved training company within electrical installations, automation, electronic communications (EKOM), switchboard manufacturing, and industrial mechanics, and provides training and educational opportunities for employees within these disciplines,

¹⁵ [Eco-Lighthouse | 2026 | The certification scheme](#)

¹⁶ [EcoVadis | 2026 | EcoVadis Silver Medal FOKUS ELEKTRO AS | recognition.ecovadis.com](#)

¹⁷ [Achilles | About us](#)

¹⁸ [Bedriftshelse1 – din samarbeidspartner på HMS](#)

including technical college and engineering programmes delivered in cooperation with the company.

In addition, an annual training plan is developed to enable employees to specialise further and qualify for new responsibilities.

8. Remediation

Measures implemented towards business relationships where violations of human rights and decent working conditions have been identified—or where a risk of such violations exists—are assessed in relation to the degree to which Fokus Elektro has contributed to the adverse impact.

In our follow-up activities and mitigation measures, we distinguish between adverse impacts caused by our own operations, impacts to which our operations have contributed, and impacts that are directly linked to our operations.

Our objective is to ensure that our actions and follow-up efforts are proportionate to the extent of our involvement in the adverse impact.

We will continuously assess the need to implement additional measures should violations occur within business relationships that are caused by or connected to our operations.

9. Information

If you would like further information regarding how Fokus Elektro manages actual and potential adverse impacts relating to breaches of fundamental human rights or decent working conditions in accordance with Section 6 of the Transparency Act, you are welcome to contact us by email at post@fokuselektro.no.

Our Transparency Act statements are published on our website <https://www.fokuselektro.no/>.

 Gjenopprettelig signatur

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Magnar Nordal
Chairman of the Board
Signert av: 56a6e914-5460-429b-82c0-daafe1bb73d0

 Gjenopprettelig signatur

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Tore Nytingnes
Daily Manager / CEO
Signert av: 56a6e914-5460-429b-82c0-daafe1bb73d0