



KOMPLETT ASA

TRANSPARENCY ACT ACCOUNT

INTRODUCTION

The Transparency Act (Åpenhetsloven) shall promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions.

The act imposes three main obligations on companies: a duty to carry out due diligence in accordance with the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (OECD guidelines), a duty to account for due diligence and a duty to answer information requests.

Komplett ASA and our subsidiaries ("Komplett Group") are committed to the protection of internationally recognised human rights and fair and ethical work practices.

Komplett Group is committed to the duty to inform the public and the duty to carry out due diligence in accordance with the OECD guidelines in the Norwegian Transparency Act and thus;

1. actively work to embed accountability in our policies,
2. map and continuously assess actual and potential impacts on fundamental human rights and decent working conditions that our operations have either caused or contributed to, or have been directly linked within operations, products or services via our supply chain or business partners,
3. implement measures to stop, prevent or limit negative impacts based on the organisation's priorities and assessments,
4. follow up on the implementation and results of the measures through the annual due diligence assessments,

5. communicate our impacts with both the public and affected stakeholders through an annual account that is easily accessible on our website, and finally,
6. remediate negative consequences that we cause or contribute to.

About the account

This account has been prepared in accordance with the Transparency Act and outlines how Komplett Group ensures the safeguarding of human rights and decent working conditions in its own operations and supply chain. It details our governance, policies, and procedures, as well as the risks identified through the updated due diligence assessment and our measures taken to mitigate them. The account follows the guidelines set by the Norwegian Consumer Authority (Forbrukertilsynet).

Komplett ASA and four subsidiaries are covered by the act's obligations: Komplett Services AS, Komplett Distribusjon AS, NetOnNet AB, and Ironstone AS.

The subsidiaries Webhallen Sverige AB, Komplett Services Sweden AB and Komplett Distribution Sweden AB are not affected by the act directly, but as all activities in Komplett Group are to be assessed, they are included in the group due diligence assessments. Accounts of the due diligence carried out by the subsidiaries can be found in separate accounts.

ABOUT KOMPLETT GROUP

Komplett Group is the leading online-first electronics player in the Nordic area and offers our customers one of the market's broadest selections of consumer electronics and business solutions.

We serve customers in the B2C, B2B and distribution segments. Our operations in the B2C segment covers sales to private consumers across Norway, Sweden and Denmark through the brands Komplett, NetOnNet and Webhallen. Our customers were served by 10 webshops, 12 physical stores and 33 complementary self-service, logistics and warehouse shops in 2024.

Komplett B2B (under the brands KomplettBedrift.no in Norway and KomplettForetag.se in Sweden) are online retailers for corporate customers in the Nordics focusing on the small and medium sized enterprises and small office and home office segments. Ironstone operates as well on the B2B segment as a cloud-based IT solution provider.

Our activities in the distribution segment consist of large-scale distribution contracts for sale to resellers and other entities not covered by B2B, which are operated under the Itegra brand.

In 2024, the group had 1 482 employees (head count 31.12.2024). Komplett Group is headquartered in Sandefjord, Norway, and listed on the Oslo Stock Exchange.

Subsidiaries

Komplett Services AS ("Komplett") provides consumer electronics on the platforms Komplett.no, Komplett.se and Komplett.dk. The company delivers to the B2B market in Norway and Sweden through Komplettbedrift.no and Komplettforetag.se.

Komplett Distribusjon AS ("Itegra") holds the group's activities in the distribution segment. Itegra is present in Norway and Sweden and serves its customers through the websites Itegra.no and Itegra.se.

Webhallen Sverige AB (“Webhallen”) is an omnichannel provider within consumer electronics, with the online platform Webhallen.com and 12 retail stores and pick-up points in Sweden. During 2024, Webhallen closed five stores.

NetOnNet AB (“NetOnNet”) has two online shops in Sweden and Norway, NetOnNet.se and NetOnNet.no, and a total of 33 complementary self-service, logistics and warehouse shops located in Sweden and Norway.

Ironstone AS (“Ironstone”) is a Norwegian cloud company helping businesses with IT solutions ranging from software to customer service.

Commitment to work with human rights and decent working conditions

Komplett Group is committed to upholding basic human rights and ensuring fair conditions within our own operations and throughout our supply chain.

Komplett Group fully supports the right of employees to form and join trade unions within the organisation and recognise the value of collective bargaining, as enshrined in the International Labour Organisation’s Core Conventions.

We maintain cooperation between trade unions, employers and the authorities through regular meetings with union representatives to discuss important issues such as recruitment and dismissal, working hours, salary practices, sick leave, and parental leave. We also ensure responsible working conditions through management and measurement related to working hours, salary practices and employee satisfaction surveys.

Komplett Group is part of the employer associations NHO Service and Virke (Norway) and Svensk Handel (Sweden). Agreements between Svensk Handel and relevant unions apply in Sweden, while the EL & IT Forbundet and Abelia agreement apply in Norway.

Komplett Group acknowledges the higher risk of human rights violations and low-quality work environments within our supply chain. As a relatively small customer for most of our suppliers, our influence is limited. Nevertheless, we have a possibility to influence our suppliers of private label products. This is therefore a prioritised area in our work with human rights and working conditions in the supply chain.

Physical factory audits

Compliance with human rights and decent working conditions is assessed through ongoing physical inspections during factory audits at our private label suppliers. Komplett Group’s private label products are sourced through our central procurement office in Guangdong/Dongguan, China, consisting of 23 employees. Dedicated employees conduct the physical factory audits. The procurement office complies with the six steps of the OECD Guidelines, as required by the Act. Contact points are established between private label suppliers and Komplett Group’s quality manager to facilitate access to information on human rights and working conditions.

Each factory is inspected at least once every two years. An inspection protocol based on the standards ISO 9001, ISO 14001 and Komplett Group’s supplier code of conduct is used during the physical factory audits. The protocol includes 70–90 questions for each of the three areas: Corporate Social Responsibility (CSR), Quality Management System (QMS) and Environmental Management System (EMS). The QMS and CSR related questions were updated in 2021 and the EMS in 2023. The CSR protocol includes specific criteria in areas such as child labour, forced labour, discrimination, fair compensation, safe working environments, health provisions, union rights, and environmental impact.

In 2024, we conducted 112 factory audits, in addition to audit-related structured dialogue and feedback sessions for employees at the factories in China producing our private label products. Additionally, due diligence checks against tier 2 suppliers were carried out, involving a total of 160 tier 2 suppliers.

Through the audits, we found that some suppliers did not meet our required standards. We mandated corrective actions to bring these suppliers up to our standards. We uphold strict guidelines against unapproved subcontracting, with monitoring conducted by the local team to ensure adherence.

We will continue to strive for greater transparency and oversight at all stages of the supply chain to protect the people affected by our business. We aim to provide guidance to suppliers that do not meet our requirements when audited to help them comply with our ethical standards.





Key measures in 2024

Below is a summary of our key efforts to minimise Komplett Group's negative impact on human rights and to promote decent working conditions across our operations, suppliers, business partners, and entire value chain:

- ▶ Our new supplier code of conduct has been implemented to manage significant impacts on workers in the value chain.
- ▶ Our centralised procurement department has continued to streamline operations, enhance control, and ensure consistent compliance with the supplier code of conduct at group level.
- ▶ We have continued to map the risks associated with Komplett Group's suppliers. All tier 1 suppliers have been mapped (see more about supplier screening on page 4).
- ▶ Our team in China conducted 112 physical factory audits of the company's private label suppliers. The outcome resulted in the termination of collaboration with 11 audited factories who failed to comply with our standards.
- ▶ We initiated due diligence checks against tier 2 suppliers, involving a total of 160 tier 2 suppliers (the suppliers of 10 tier 1 suppliers).
- ▶ We have assessed our influence on minerals sourcing from conflict-affected regions. Through a due diligence process, we have assessed our influence as low.
- ▶ Strengthened our team with a sustainability manager in Komplett Group to further improve the company's ESG-work, including supplier assessments.

GOVERNANCE OF HUMAN RIGHTS AND DECENT WORKING CONDITIONS

To ensure responsible business practices at group level, we centralised Komplett Group's procurement department in 2023. The department includes four category directors, as well as one business director who is responsible for supplier agreements, private label and supplier onboarding and follow-up.

Responsibilities

The board of directors is informed about the Transparency Act and the duties connected to the law. Komplett Group reports to the board of directors on our human rights efforts related to both our own operations and the supply chain.

The group CEO is responsible for the group complying with the duties as set out in the act. The group CFO is involved in overseeing these efforts and has

the ultimate responsibility for corporate governance, including the oversight of strategic planning, review of strategic processes and sustainability reporting. The director legal & compliance of the group has the operational responsibility that the group conducts due diligence on human rights and decent working conditions. This is done in collaboration with the subsidiaries.

Each subsidiary has the responsibility to make sure due diligence and supplier assessments on human rights and decent working conditions is conducted in line with the act and the OECD guidelines. For more information about responsibilities in the subsidiaries, please see the separate accounts.

Policies and governing documents

Komplett Group has integrated human and labour rights into the core business principles and processes that govern how we make decisions and carry out daily operations. Where applicable, the standards and policies have been updated based on internationally recognised initiatives such as the principles of the UN Global Compact, the OECD guidelines, and the United Nations Convention against Corruption.

One of the main actions in 2024 to manage the significant impacts on workers in the value chain was the implementation of the new standardised supplier code of conduct. Komplett Group's framework agreement for purchasing goods is consistent with the UN Universal Declaration of Human Rights, the ILO's (International Labour Organisation) eight core human rights conventions on working life, the Convention on the Rights of the Child, UN Global Compact, and the OECD guidelines. The group CEO approved the updated policy, and it is included as a standard purchasing policy in all new supplier agreements signed at group level.

Further, in 2024 Komplett Group established a new sustainability policy and HR policy, which further establishes the company's commitment to securing human rights and decent working conditions.

Our code of conduct and anti-corruption and bribery policy set out our zero-tolerance policy on bribery and corruption. Through the Learnifier training platform, all employees at Komplett Group shall undergo regular training on corruption risk and business ethics. These policies are signed by all employees.

>> For an overview of the different policies governing the operations of Komplett Group, please see the general information chapter in Komplett Group's sustainability statement 2024.

Whistleblowing

Komplett Group recognises the right of any employee to report any misconduct related to the company. We use the whistleblower channel to systematically map the risk of non-compliance in our own operations, both in Scandinavia and in the procurement office in China. Whistleblowers are not subject to direct or indirect sanctions.

Our whistleblower channel facilitates anonymous reporting and is overseen by an independent third party. The channel is available to employees through the intranet website, and to all external stakeholders through our websites. Concerns raised through this channel are handled in accordance with established whistleblower procedures and can relate to any area, including human and labour rights.

A whistleblower group is responsible for addressing reports of misconduct. All reported concerns are investigated to determine the root causes and assess appropriate corrective and preventive actions. This may include the involvement of relevant authorities as required, such as trade union representatives, or legal counsel.

DUTY TO PROVIDE INFORMATION

In accordance with the reporting obligation set forth in the Transparency Act, the company will publicly report on its due diligence assessments on its website. In accordance with the obligation to provide information, the group also responds to information requests from business associates, journalists, and other stakeholders on how the group works with due diligence assessments to ensure respect for human rights and decent working conditions.

DUE DILIGENCE WITH RESPECT TO HUMAN RIGHTS AND DECENT WORKING CONDITIONS

Komplett Group values transparency as a key component to ensure that the products sold are of high quality and are manufactured in safe conditions with no violations of human and labour rights. We aim to implement a risk-based supply chain mapping to identify potential risks and ensure compliance with commitments and standards during 2025.

Supplier screening

All tier 1 suppliers have been mapped, more than 1 000 in total, in addition to approximately 1 500 business partners. The risk level has been set based on geography, product/service type and raw materials.

The risk assessment emphasises that the production of electronic components, metals and plastics poses an increased risk of human rights violations. Further, mining and mineral sourcing, especially lithium and other relevant minerals for microchip production, involve risks for workers, including harsh conditions, noise, long hours, and vibrations. The working conditions for the transportation and logistics industry are also considered to have a higher risk of human rights violations.

We influence our suppliers by ensuring that appropriate policies and contractual commitments are in place. Efforts to eliminate child- and forced labour can include identifying suppliers beyond tier 1, conducting due diligence and audits. Training, communication, and awareness-raising programmes are also important measures to mitigate human rights violations.

In determining mitigating actions based on the risk assessment, we recognise that we have most influence over the suppliers of own private label products and the choices regarding downstream transportation. In 2024, all new suppliers associated with Komplett Group's private label were screened using social criteria based on international guidelines. The screening allows us to assess whether the suppliers comply with relevant laws and regulations, as well as ethical standards, including labour rights, human rights, and decent working conditions.

The work on further risk assessment and elaborating mitigating actions will continue in 2025.

Due diligence assessment

We conduct our annual due diligence based on the ISO Standard 31000 methodology for risk management through supervised workshops with an external consultancy agency. The aim is to identify, prioritise, and mitigate risks related to our ability to safeguard human rights and decent working conditions. Key people from the group and subsidiaries with insight into the value chain and procurement processes participate. In the assessment, we consider risks associated with our own operations, business partners and supply chains.



Following the due diligence assessment this year, we identified both internal and external risks, established mitigation plans and implemented measures to mitigate potential negative impacts.

Internal risk

With regards to the supply chain, Komplett Group has yet to initiate screening and supplier assessments, except for private label. This means that despite having good insights into the risk of violations of human rights and decent working conditions for private label suppliers, we have less insight into other suppliers.

Further, limited resources and lack of system support make it challenging to carry out proper supplier assessments. A consequence of this is limited insight and knowledge about the supply chain and its potential risks.

Furthermore, there is risk related to improvement of routines and agreements with business partners. Business partners shall sign the group's supplier code of conduct, especially to ensure that the business partners within the service and maintenance industry comply with the Transparency Act. For instance, Komplett Group is aware that workers in the transportation and logistics industry have a higher risk of work rights violations. The sector is under high pressure to compete on flexibility and responsiveness from the companies, which applies pressure to reduce wages and working conditions. Although no incidents were reported in 2024, we intend to contribute to mitigating the potential risks of human rights abuses and unsatisfactory working conditions by promoting a culture of accountability among our business partners.

As for our own workforce, a relevant risk is health and safety for employees in warehouses and stores. However, the risk is considered to be low due to strict regulations for health and safety in the workplace as well as our robust mechanisms to promote labour rights.

External risk

The most significant external risk identified by Komplett Group is the use of minerals in, for example, mobile phones and computers. Activities include the extraction, transportation, handling, trading, processing, smelting, refining, and alloying of raw materials.

Minerals are defined by the OECD as high-risk raw materials if they originate from conflict-affected and high-risk areas characterised by armed conflict, widespread violence, or other risks of harm to people. Following the EU Conflict Minerals Regulation, we have assessed our influence on minerals sourcing from these regions.

Our due diligence process revealed that our influence is low since we are retailers and distributors of finished goods, with activities associated with minerals sourcing occurring far beyond our direct suppliers. Consequently, we have limited oversight and control. Nonetheless, given the seriousness of the issue, we have identified the use of minerals as a risk area requiring ongoing attention.

The production of other electronic components, such as electronic parts, metals, and plastics, also carries a high risk of labour and human rights violations. Mining and mineral sourcing, particularly for lithium and other relevant minerals for microchip materials, pose risks to workers, including harsh conditions, noise, and long working hours.

Another key challenge is that our supply chain is extensive and multi-tiered. With over 1 000 suppliers worldwide, conducting thorough supplier audits requires extensive screenings and analysis, which have not yet fully implemented. This increases the risk of overlooking human rights and decent work violations in both production and distribution.

Regarding our private label brands, our experience in China indicates that suppliers have limited transparency and control beyond tier 1 suppliers. Consequently, there is a risk of human rights abuses and poor working conditions in the production of our private label products. This is why we initiated due diligence checks of tier 2 suppliers in 2024.

Additionally, there are risks associated with shipping from China. The transport sector is considered particularly vulnerable in terms of decent working conditions, and we continuously monitor these risks.

For more information about findings in the subsidiaries' due diligence assessments, please see the separate accounts.

MITIGATION OF RISK

Based on previous risk assessments, and the updated assessment for 2024, we are continuing our measures to manage and mitigate potential negative impacts:

1. Further develop the responsibilities and routines regarding supplier assessments

- ▶ Continue with supplier assessments for new suppliers, as well as monitoring risks related to existing suppliers.
- ▶ Implement a new supplier management system in 2025.
- ▶ Continue to strengthen our supplier audits.
- ▶ Continuously assess the need for resources and more in-depth expertise.
- ▶ Plan and conduct on-site supplier audits of private label suppliers at a defined frequency, prioritising suppliers with a high risk of having a negative impact on labour rights, human rights, and working conditions.

2. Continue developing routines and procedures for due diligence assessments of business partners

- ▶ Continue to follow up our business partners in the transport and logistics industry, in line with Norwegian Labour Inspection Authorities (Påseplikten) and our related policy.
- ▶ Aim to have all service suppliers and other business partners signing the supplier code of conduct.

3. Increase employees' knowledge and awareness on sustainable sourcing

- ▶ With the help of Learnifier, an annual supplier code of conduct training for all purchasers and other relevant functions in the organisation will be provided.
- ▶ Employees who purchase services on behalf of the company must be familiar with the supplier assessments carried out by the procurement department to ensure compliance with the Transparency Act. They are required to replicate these assessments before signing agreements with new business partners.

4. Conduct risk mapping of countries and products

- ▶ Komplett Group will continue to conduct the risk-based supply chain mapping, to gain more knowledge of its supply chain.

5. Ensure health and safety for individuals on our premises

- ▶ Foster a safety culture grounded in environmental, health and safety guidelines.
- ▶ Ensuring safe waste disposal practices to protect the health of workers involved in waste recycling.

6. Monitor measures

- ▶ We monitor the impacts of the abovementioned initiatives and continuously improve our practices.


EXPECTED EFFECTS OF THE MEASURES

- ▶ The continued efforts on supplier audits, as well as the inclusion of due diligence checks of tier 2 suppliers, aims to strengthen risk management throughout the supply chain.
- ▶ The due diligence checks and requirement for all business partners to sign the supplier code of conduct will support that the group has business partners with the same business ethics and values.

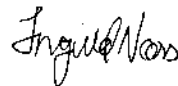
- ▶ The initiatives to increase employee competency and awareness, from local skills development to annual supplier code of conduct training, are expected to contribute to a culture of responsible sourcing.
- ▶ Ongoing supply chain mapping ensures that Komplett Group takes a proactive approach towards responsible sourcing.

Altogether, these measures represent a way to enhance ethical, responsible, and transparent business practices, aligning Komplett Group with its commitment to sustainable and socially responsible operations.

Sandefjord, 20 March 2025
Board of directors and CEO, Komplett ASA



Jo Olav Lunder
Chair



Ingvild Næss
Director



Susanne Ehnbåge
Director



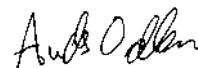
Jan Ole Stangeland
Director



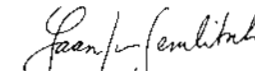
Fabian Bengtsson
Director



Emelie Anna Teresia Victorin
Worker director



Anders Odden
Worker director



Jaan Ivar Semlitsch
CEO

KOMPLETT SERVICES AS & KOMPLETT DISTRIBUTUSJON AS

TRANSPARENCY ACT ACCOUNT

This account has been prepared in accordance with the Transparency Act and covers activities in Komplett Services AS and Komplett Distribusjon AS ("Komplett"). It summarises governance, policies, and procedures regarding the protection of human rights and decent working conditions, as well as risks identified in the due diligence assessment and measures to mitigate these risks.

ABOUT KOMPLETT

Komplett provides consumer electronics on the platforms Komplett.no, Komplett.se and Komplett.dk. Komplett also operates two pick-up points, one in Oslo and one at the warehouse in Sandefjord. Komplett delivers to the B2B market in Norway and Sweden through Komplettbedrift.no and Komplettforetag.se. The head office is located in Sandefjord, Norway.

Through the brand Itegra, Komplett holds the group's activities in the distribution segment and consist of large-scale distribution contracts for sale to resellers and other big entities not covered by B2B. Itegra is present in Norway and Sweden and serves its customers through the websites Itegra.no and Itegra.se.

Komplett mainly sells products from large and established brands. Throughout 2024, Komplett collaborated with over 200 tier 1 suppliers. Komplett also offers private label products under brand names such as Svive, liglo and Pro tech tools.

Commitments to human rights and decent working conditions

Komplett complies with the Komplett Group commitments. For more information, please see the Komplett ASA account.

GOVERNANCE OF HUMAN RIGHTS AND DECENT WORKING CONDITIONS**Responsibilities**

The board of directors has been informed of the Transparency Act and the duties connected to the law. The group CEO is responsible for the group and its subsidiaries complying with the duties set out in the act.

Komplett's compliance and quality director has the responsibility for conducting due diligence on human rights and decent working conditions in line with the act and the OECD guidelines.

For more information on responsibilities, please see the Komplett ASA account.

Policies and governing documents

Komplett expects all our suppliers to share our values and requirements regarding responsible business conduct. The supplier code of conduct is signed by the suppliers as part of the agreement. In 2024, no major breaches of the supplier code of conduct were reported.

In 2025, Komplett will continue to adopt Komplett Group's updated supplier code of conduct to align our policies with UN Global Compact principles and OECD Guidelines, as well as other internationally recognised initiatives, such as the UN Guiding Principles on Business and Human Rights.

For more information on policies and governing documents, please see the Komplett ASA account.

Whistleblowing

Komplett has a channel for whistleblowing in place. For more information, please see the Komplett ASA account.

DUE DILIGENCE WITH RESPECT TO HUMAN RIGHTS AND DECENT WORKING CONDITIONS**Due diligence assessment**

Through a supervised workshop in January 2025, Komplett Group has conducted a strategic due diligence assessment on behalf of Komplett Services, in accordance with the requirements of the Transparency Act. The assessment performed by key personnel from the group and subsidiaries, was based on a methodology including ISO Standard 31000 for risk management, with the aim to identify and prioritise risk related to Komplett's ability to promote and protect human rights and decent working conditions.

In the assessment, we looked at risks associated with our own operations, business partners and supply chains. Key employees with insight into the value chain and procurement processes participated. Both internal and external risks were covered.

Komplett also maps the risks associated with all our suppliers and business partners. All tier 1 suppliers and business partners are mapped, and risk level has been set based on geography, product type and raw materials. This work will continue in 2025.

Internal risk

Komplett has identified a need for additional expertise and resources to strengthen the work related to supplier assessments. Further, system support is needed for the company to be able to carry out assessments of the supply chains in an effective way and to provide documentation to stakeholders regarding information requests.

Moreover, we do not have a risk profile of products and commodities which makes it challenging to prioritise suppliers and areas in need of screening and assessments.

External risk

We have identified minerals from conflict-affected and high-risk areas as a matter of severe risk. For more information about this, please see the Komplett ASA account.

Further, protection of human rights and decent working conditions in production, as well as chemical use in this part of the supply chains is seen as areas of high risk. The risk is increasing as the supply chain is complex and has a low degree of transparency. There is also a lack of competence in the supply chain on these matters.

Lastly, Komplett has identified human rights and decent working conditions in distribution as an area of risk, especially outside of Scandinavia.

MITIGATION OF RISK**Measures**

Based on the strategic due diligence assessment, Komplett has not identified actual negative impacts on fundamental human rights and decent working conditions linked to the company's own operations, the supply chains and business partners.

Gaining a better insight into our supply chains is an important measure in 2025 and going forward. There has been a project to further monitor sourcing partners through audits for compliance with the standards and requirements set out in our supplier code of conduct.

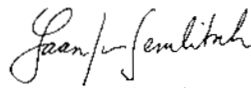
For the potential negative impacts identified in the strategic due diligence assessment, the following measures and initiatives have been identified:

- ▶ Establish a plan for supplier screening and assessments.
- ▶ Self-assessment surveys of new and existing suppliers.
- ▶ Continue to improve risk mapping of countries, products, and raw materials.
- ▶ Assess the need for resources and competence.
 - Establish a plan for competence development and to develop an annual training programme through Learnifier.
- ▶ Collaborate with Komplett Group regarding sourcing of private label.

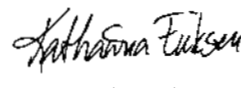
The continued implementation of the above-mentioned measures will provide Komplett with a better overview of all risks related to human rights and decent working conditions. Further, measures will contribute to monitor potential risk and adverse impact that might occur.

Sandefjord, 20 March 2025

Board of directors and managing director, Komplett Services AS & Komplett Distribusjon AS



Jaan Ivar Semlitsch
Chair



Katharina Eriksen
Director



Thomas Røkke
Director



Morten Johnsen
Managing director
Komplett Services



Jan Erik Svendsen
Managing director
Komplett Distribusjon AS

NETONNET AB

TRANSPARENCY ACT ACCOUNT

This account has been prepared in accordance with the Transparency Act and covers activities in NetOnNet AB ("NetOnNet"). It summarises governance, policies, and procedures regarding the protection of human rights and decent working conditions, as well as risks identified in the due diligence assessment and measures to mitigate these risks.

ABOUT NETONNET

NetOnNet has two online shops in Sweden and Norway, NetOnNet.se and NetOnNet.no, and a total of 33 complementary self-service, logistics and warehouse shops, of which 29 are located in Sweden and four in Norway. In addition, one shop has opened in Norway in 2025. Since 2022, NetOnNet has been part of Komplett Group. The head office is located in Borås, Sweden.

While NetOnNet mainly sells products from large and established brands, the company also offers private label products under brand names such as Andersson, Austin & BBQ, Mission SG, Loeffen, Pure Sense and Avant.

Commitments to human rights and decent working conditions

NetOnNet complies with the group commitments. For more information, please see the Komplett ASA account.

GOVERNANCE OF HUMAN RIGHTS AND DECENT WORKING CONDITIONS**Responsibilities**

The board of directors has been informed of the Transparency Act and the duties related to the law. The group CEO is responsible for the group and its subsidiaries complying with the duties as set out in the act.

NetOnNet's managing director is responsible for the work related to sustainability at NetOnNet. This includes the responsibility for conducting due diligence on human rights and decent working conditions in line with the act and the OECD guidelines.

For more information on responsibilities, please see the Komplett Group Account.

Policies and governing documents

NetOnNet uses the Komplett Group supplier code of conduct, which is based on the UN Universal Declaration of Human Rights, the ILO's (International Labour Organisation) eight fundamental human rights conventions on working life, the Convention on the Rights of the Child, UN Global Compact, and the OECD Guidelines for the Operations of Multinational Enterprises.

For more information on policies and governing documents on group level, please see the Komplett ASA account.

Whistleblowing

NetOnNet has a channel for whistleblowing in place. For more information, please see the Komplett Group Account.

DUE DILIGENCE WITH RESPECT TO HUMAN RIGHTS AND DECENT WORKING CONDITIONS**Due diligence assessment**

Through a supervised workshop in January 2025, Komplett Group has conducted a strategic due diligence assessment on behalf of NetOnNet, in accordance with the requirements of the Transparency Act. The assessment performed by key personnel from the group and subsidiaries, was based on a methodology including ISO Standard 31000 for risk management, with the aim to identify and prioritise risk related to NetOnNet's ability to promote and protect human rights and decent working conditions.

In the assessment, we looked at risks associated with our own operations, business partners and supply chains. Key employees with insight into the value chain and procurement processes participated or were consulted, and both internal and external risk were covered.

We also map the risks associated with all our suppliers and business partners. All tier 1 suppliers and business partners are mapped, and risk level has been set based on geography, product type and raw materials. The work will continue in 2025.

Internal risk

NetOnNet has identified a need for additional expertise and resources to strengthen the work on due diligence and supplier assessments going forward. Further, system support is needed for the company to be able to carry out due diligence and assessments of suppliers in line with the OECD guidelines in the future.

We do not conduct screening or assessments of brand suppliers. Brand suppliers do, however, sign the supplier code of conduct. As for business partners and distribution partners, the supplier code of conduct has not been signed.

External risk

NetOnNet has identified the sourcing of minerals from conflict-affected and high-risk areas as a significant risk. For more information on this, please see the Komplett ASA account. Additionally, working conditions at subcontractors to tier 1 suppliers of private label products is considered a risk, as much of the production is done in China. Furthermore, brand suppliers exhibit a low degree of transparency in how they work to protect human rights and decent working conditions.

MITIGATION OF RISK

Measures

Based on the strategic due diligence assessment and other conducted screenings, NetOnNet has not identified actual negative impacts on fundamental human rights and decent working conditions linked to our own operations, the supply chains and business partners.

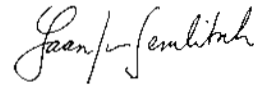
For the potential negative impacts identified in the strategic due diligence assessment the following measures and initiatives have been identified:

- ▶ Establish system support for self-assessment questioners for tier 1 suppliers.
- ▶ Increase knowledge and carry out risk assessment of the use of conflict minerals in products provided.
- ▶ Increase knowledge and continue to carry out due diligence assessment of subcontractors of private label.
- ▶ Map the need for resources.
- ▶ Establish a plan for competence development.

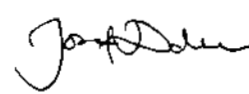
Continuing to implement these measures will provide NetOnNet with better transparency related to human rights and decent working conditions. Further, measures will contribute to monitor potential risk and adverse impact that might occur.

Sandefjord, 20 March 2025

Board of directors and managing director, NetOnNet AB



Jaan Ivar Semlitsch
Chair



Josefin Dalum
Managing director



Thomas Røkke
Director

WEBHALLEN SVERIGE AB

TRANSPARENCY ACT ACCOUNT

This account has been prepared in accordance with the Transparency Act and covers activities in Webhallen Sverige AB ("Webhallen"). It summarises governance, policies, and procedures regarding the protection of human rights and decent working conditions, as well as risks identified in the due diligence assessment and measure to mitigate these risks.

ABOUT WEBHALLEN

Webhallen is a Swedish retailer in hardware, home electronics, gadgets, games, and film. The company is an omnichannel provider with the online platform Webhallen.com and in 2024 there were 12 retail stores and pick-up points, located strategically around Stockholm and bigger cities in Sweden. Five stores were closed during the year. The company was acquired by Komplett Group in 2013 and has the head office in Stockholm, Sweden.

Webhallen sells mainly products from large and established brands. Throughout 2024, Webhallen collaborated with over 200 suppliers.

Commitments to human rights and decent working conditions

Webhallen complies with the group commitments. For more information, please see the Komplett ASA account.

GOVERNANCE OF HUMAN RIGHTS AND DECENT WORKING CONDITIONS Responsibilities

The board of directors has been informed of the Transparency Act and the duties connected to the law. The group CEO is responsible for the group and its subsidiaries complying with the duties as set out in the act.

Webhallen's managing director has the responsibility for conducting due diligence on human rights and decent working conditions in line with the act and the OECD guidelines.

For more information on responsibilities at group level, please see the Komplett ASA account.

Policies and governing documents

The Komplett Group code of conduct for employees describes Webhallen's commitment to maintaining high ethical standards in everything the company does. It sets out the standards of behaviour that Webhallen can expect from internal parties, and what external parties can expect from Webhallen. The Komplett Group Code of Conduct for suppliers also apply at Webhallen.

For more information on group policies and governing documents, please see the Komplett ASA account.

Whistleblowing

Webhallen has a channel for whistleblowing in place. For more information, please see the Komplett ASA account.

DUE DILIGENCE WITH RESPECT TO HUMAN RIGHTS AND DECENT WORKING CONDITIONS**Due diligence assessment**

Komplett Group has conducted a strategic due diligence assessment on behalf of Webhallen, in accordance with the requirements of the Transparency Act. The assessment performed by key personnel from the group and subsidiaries, was based on a methodology including ISO Standard 31000 for risk management, with the aim to identify and prioritise risk related to Webhallen's ability to promote and protect human rights and decent working conditions.

In the assessment, we looked at risks associated with our own operations, business partners and supply chains. Key employees with insight into the

value chain and procurement processes participated or were consulted, and both internal and external risks were covered.

Additionally, we map the risks associated with all our suppliers and business partners. All tier 1 suppliers and business partners are mapped, and risk level has been set based on geography, product type and raw materials. The work will continue in 2025 and going forward.

Internal risk

Webhallen does not conduct due diligence or supplier screening/assessments on human rights and decent working conditions on either new or existing suppliers. The company has identified a need for additional expertise and resources to strengthen the work on due diligence and supplier assessments. Further, system support is needed for Webhallen to be able to carry out assessments of the supply chains accordingly.

A consequence is that Webhallen has limited insight and knowledge about potential risk that might occur in the supply chains. As for the company's own operations, Webhallen has identified health and safety for employees in warehouses and stores as an area of risk.

However, the risk is considered to be low due to adherence to strict regulations on health and safety and employee rights.

External risk:

Webhallen has identified minerals from conflict-affected and high-risk areas as a severe risk. For more information about this, please see the Komplett ASA account. The same goes for working conditions in the production part of the supply chains. Our supply chains are of high complexity which may increase the risk of violation of human rights and decent working conditions. Further, working conditions in distribution are also considered an area of risk.

MITIGATION OF RISK

Measures

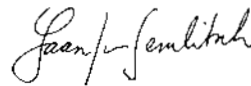
Based on the strategic due diligence assessment, Webhallen has not identified actual negative impacts on fundamental human rights and decent working conditions linked to our own operations, the supply chains and business partners. For the potential negative impacts identified in the due diligence assessment the following measures and initiatives have been identified:

- ▶ Develop routines, checklists and other governing documents for due diligence and screening/assessments of suppliers.
- ▶ Assess the need of resources.
- ▶ Establish a plan for competence development.
- ▶ Risk mapping of countries, products, and raw materials.

Continuing to implement these measures will provide Webhallen with better transparency related to human rights and decent working conditions. Further, the measures will contribute to monitoring potential risk and adverse impacts that might occur.

Sandefjord, 20 March 2025

Board of directors and managing director, Webhallen Sverige AB



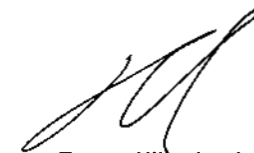
Jaan Ivar Semlitsch
Chair



Katharina Eriksen
Director



Thomas Røkke
Director



Trygve Hillesland
Managing director

IRONSTONE AS

TRANSPARENCY ACT ACCOUNT

This account has been prepared in accordance with the Transparency Act and covers activities in Ironstone AS ("Ironstone"). It summarises governance, policies, and procedures regarding the protection of human rights and decent working conditions, as well as risks identified in the due diligence assessment and measure to mitigate these risks.

ABOUT IRONSTONE

Ironstone is a cloud company helping businesses with IT solutions ranging from software to customer service. Ironstone aims to be a business partner rather than a traditional IT partner and delivers hardware through Komplett as part of their service. Ironstone was acquired by Komplett Group in 2021. The head office is located in Oslo, Norway.

Commitments to human rights and decent working conditions

Ironstone complies with the group commitments. For more information, please see the Komplett ASA account.

GOVERNANCE OF HUMAN RIGHTS AND DECENT WORKING CONDITIONS**Responsibilities**

The board of directors has been informed of the Transparency Act and the duties connected to the law. The group CEO is responsible for the group and the subsidiaries complying with the duties as set out in the act.

In Ironstone, the managing director is responsible for the company conducting due diligence on human rights and decent working conditions in line with the act and the OECD guidelines.

For more information on group responsibilities, please see the Komplett ASA account.

Policies and governing documents

Komplett Group's code of conduct for employees describes Ironstone's commitment to maintaining high ethical standards in everything the company does. It sets out the standards of behaviour that Ironstone can expect from internal parties, and what external parties can expect from Ironstone. The Komplett Group code of conduct for suppliers also apply at Ironstone.

Whistleblowing

Ironstone has procedures for whistleblowing in place. For more information, please see the Komplett ASA account.

DUE DILIGENCE WITH RESPECT TO HUMAN RIGHTS AND DECENT WORKING CONDITIONS**Due diligence assessment**

Komplett Group has conducted a strategic due diligence assessment on behalf of Ironstone, in accordance with the requirements of the Transparency Act. The assessment performed by key personnel from group and subsidiaries, was based on a methodology including ISO Standard 31000 for risk management, with the aim to identify and prioritise risk related to our ability to promote and protect human rights and decent working conditions.

In the assessment, we looked at risks associated with our own operations, business partners and supply chains. Key employees with insight into the value chain and procurement processes participated or were consulted, and both internal and external risks were covered.

Furhermore, we map the risks associated with all our suppliers and business partners. All tier 1 suppliers and business partners are mapped, and risk levels are set based on geography, product type and raw materials. The work will continue in 2025 and going forward.

Internal risk

Ironstone has identified limited resources and competence to conduct in-depth screening of suppliers as a risk for our ability to promote human rights and decent working conditions.

External risk

As part of the service, Ironstone, may deliver hardware to customers, supplied by Komplett. Some of these hardware products are risk exposed as they contain minerals where it is considered to be a high risk of violation of human rights and working conditions. For more information about minerals from conflict-affected and high-risk areas, please see the Komplett ASA account.

Further, Ironstone has identified materials used in data centres as an area that might involve risk.

MITIGATION OF RISK

Measures

Based on the strategic due diligence assessment, Ironstone has not identified actual negative impacts on fundamental human rights and decent working conditions linked to our own operations, the supply chains and business partners.

For the potential negative impacts identified in the due diligence assessment the following measures and initiatives have been identified:

- ▶ Develop routines, checklists and other governing documents for due diligence and assessments of suppliers.
- ▶ Establish systems and routines for assessment of tier 1 suppliers through self-assessment /questionnaires.
- ▶ Assess the need for resources and competence.
- ▶ Risk prioritisation of existing suppliers.
- ▶ Map the conditions in the service parks of business partners.

Implementation of measures will provide Ironstone with better transparency related to human rights and decent working conditions. Further, the measures will contribute to monitor potential risk and adverse impact that might occur.

Sandefjord, 20 March 2025

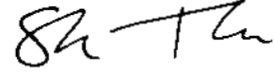
Board of directors and managing director, Ironstone AS



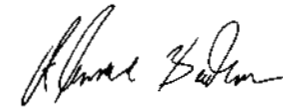
Jan Erik Svendsen
Chair



Stig Nerland
Director



Stefan Thoren
Director



Alexander Bergedalen
Managing director

Komplett ASA

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