

# NIKKELVERK

A GLENCORE COMPANY

## Glencore Nikkelverk AS – statement The Transparency Act for 2023

This law came into effect on July 1, 2022. The purpose of the Act is to promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services, and to ensure public access to information on how enterprises deal with negative consequences for fundamental human rights and decent working conditions. We are obliged to publish a statement of the due diligence assessments, and to state in the annual report where this report can be found.

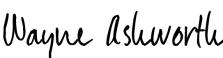
The Transparency Act's §4, which deals with requirements for conducting due diligence, largely coincides with the group's requirements for responsible sourcing. These have been well implemented in 2023. The compliance coordinator ensures that we meet these requirements, in cooperation with, among others, the procurement department and quality coordinator.

Our website provides a separate e-mail address that can be used for reporting unethical actions.

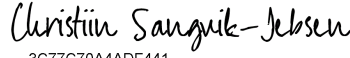
Emails to this address are received by the HR Director and the Compliance Coordinator. This is in line with how the receipt and processing of other reports is organized. The HR director is the company's primary whistleblowing contact. Glencore has comprehensive procedures for handling any reported concerns, both internal and external, to ensure that negative consequences are avoided/minimized. This procedure is placed as part of the responsibility of the Compliance Coordinator.


Nikkelverk has not uncovered any negative consequences or significant risk of negative consequences during its due diligence assessments in 2023. Neither have we received any requests for information about our due diligence. Our efforts to stop and limit the risk of negative impacts are, and have been, to conduct research upfront on our potential suppliers to ensure that they embody the same values as Glencore, as well as conducting checks and audits of our existing suppliers.


### Board of Directors of Glencore Nikkelverk AS


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Wayne Bradley Ashworth

DocuSigned by:  
  
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Vesna Romic Mueller


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Christiin Sangvik-Jebesen


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Lars Petter Maltby

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Alexander Andersen

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Roar S. Berg

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Stein Magne Nilsen

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Jorunn Gislefoss

DocuSigned by:  
  
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Nils G. Gjelsten

(Chairperson)

Managing director