

## Sirva AS Statement Regarding the Transparency Act for the Reporting Year 2024

### About the Transparency Act

The Transparency Act aims to promote businesses' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services, as well as to ensure public access to information about how businesses handle negative impacts on human rights and decent working conditions.

### About Us, Products, Services, and the Market We Operate In

Sirva AS is Norway's leading company in moving and relocation services, with headquarters in Oslo and roots dating back to 1937. We assist individuals, businesses, and the public sector with national and international moving processes and storage, relocation services such as visa and immigration assistance, housing searches, and guidance on schools and kindergartens. Our goal is to create safe and effective solutions tailored to each customer's needs.

Sirva AS is part of the global group Sirva Worldwide, Inc., headquartered in the USA, with a network in over 190 countries. Through our strong global network, we have well-known brands such as Allied and northAmerican, access to strong professional capacity, modern technology, and extensive experience – while maintaining our local presence and flexibility in the Norwegian market.

We have a strong focus on accountability and sustainability throughout our operations. This includes environmental measures such as efficient transport planning, digitization of processes to reduce paper consumption, and continuous improvement of our resource use. Additionally, we place great emphasis on good working conditions, inclusion, and a safe working environment for both our employees and partners.

Ethics, morality, and integrity are a natural part of our culture. We have clear guidelines for responsible business practices and adhere to international principles for social and environmental sustainability. We systematically work on supplier follow-up, quality assurance, and continuous improvement at all levels of our services.

By combining local knowledge, global experience, and a strong commitment to sustainability, we aim to be a long-term and reliable partner for our customers and subcontractors.

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## How We Work with the Transparency Act

Sirva AS is covered by the Transparency Act and has integrated the work with due diligence assessments into our overall strategy for responsible and sustainable business operations. The assessments are conducted in accordance with the OECD guidelines for responsible business conduct and encompass both our own operations and our supply chain.

In accordance with Section 4 of the Transparency Act, we have mapped and assessed suppliers and business partners with whom we have repeated or significant business relationships, and where the total purchase value has exceeded NOK 100,000 in the past year. The assessments particularly consider geographic risk profiles, regulatory conditions, industry-specific challenges related to working conditions and health, safety, and environment (HSE), as well as suppliers' practices regarding ethics, social sustainability, and responsible business conduct. We also assess available documentation related to guidelines, policies, and follow-up of subcontractors.

As a basis for the assessments, we use document collection, written supplier surveys, dialogue, and information gathering from open sources. This provides us with a comprehensive risk picture and a basis for decision-making for further follow-up where deemed necessary.

The work with the Transparency Act is broadly organized into the following work phases:

### Facilitation

- Establish the scope for the work with the Transparency Act and due diligence assessments
- Involve participants in the work with the Transparency Act and due diligence assessments
- Identify and analyze stakeholders related to the work with the Transparency Act

### Due Diligence Assessments

- Anchor the work with the Transparency Act
- Anchor guidelines for responsible business conduct
- Map actual and potential negative impacts on human rights and decent working conditions
- Implement measures for actual conditions and significant risks

- Control and document the effect of measures
- Communicate with stakeholders
- Restore and compensate for actual harm to human rights and decent working conditions

### Statement

- Annual statement of results from the due diligence assessments (by June 30 each year)

### Responding to Questions

- Ensure that everyone can contact us and ask questions about how we work with the Transparency Act and the results from our due diligence assessments

This procedure is based on methodology and digital workspaces from [Tavler AS](#).

Sirva AS's Guidelines for Responsible Business Conduct

Sirva AS guidelines are anchored in the board and implemented in the company.

#### *Guideline*

#### *Use of Guideline*

The policy for responsible business conduct should be used internally in our own company and also towards our suppliers and partners, so that we all work systematically and in the same direction regarding the safeguarding of human rights and decent working conditions.

#### *Policies for Responsible Business Conduct*

Policy for ansvarlig næringsliv i bedriften er et integrert policy-dokument, som ivaretar alle tre fokusområder (menneskerettigheter, anstendige arbeidsforhold og ytre miljø) for ansvarlig næringsliv.

#### *Ethical Guidelines*

Ethical guidelines are used internally in our own company and also towards our suppliers and partners, so that we are all covered by the same guidelines for ethical business conduct.

*Requirements for Suppliers and Partners* This governing document is used as an attachment to standard contracts with suppliers/partners, so that we contractually establish considerations for responsible business conduct in all contractual agreements.

#### Results from Our Work with Due Diligence Assessments

The risk is assessed along two axes: probability and consequence, and is presented in a traffic light system with the following scale:

Category	Color	Explanation
Probability	 Low	There are no indications of risk, and the industry or supplier has documented a low risk profile.
	 Medium	There is some risk based on known industry information, limited insight, or unresolved issues.
	 High	There is documented risk, alerts, or conditions that raise strong concerns.
Consequence	 Low	A potential deviation will have little impact on workers' health, safety, or rights.
	 Medium	A deviation may cause harm or impairment of rights, but to a limited extent or duration.
	 High	A deviation could lead to serious or long-term violations of rights, health damage, or loss of income/security.

We have identified the following risks and/or actual events with negative impacts on responsible business conduct:

#### Procurement of Transport and Storage Services

Consequence , Probability 

#### What Are We Uncertain About?

Sirva uses external suppliers when purchasing transport and storage services in connection with carrying out assignments for our customers. These services are primarily performed by professional actors operating in Norway and internationally, who have established routines for compliance with relevant regulations, health, safety, and environment (HSE), and responsible business practices. To date, we have not received information or uncovered indications of violations of human rights, decent working conditions, or HSE conditions with any of our direct suppliers.

However, we are aware that the transport and logistics industry is associated with particular risks of violations of fundamental rights and HSE standards, especially related to wage and working conditions for drivers and warehouse workers. Challenges in the industry may include long working hours, low unionization, insufficient rest periods, informal employment conditions, and limited follow-up on safety and working environment.

The risk increases in cases where parts of the transport or storage are outsourced to subcontractors, or where temporary labor is used through third-party actors. In such cases, it can be challenging to gain full oversight of actual working conditions and compliance with legal requirements throughout the supply chain.

Work on HSE is considered an integral part of our due diligence assessments under the Transparency Act, as weak HSE routines are often closely linked to violations of human rights and degrading working conditions. Lack of training, absence of safety services, insufficient risk assessment, or poor organization of the working environment can lead to health-harming, unsafe, or degrading working conditions – especially for workers with temporary or indirect ties to the business. Ensuring a safe and health-promoting working environment is therefore not only an HSE issue but also a prerequisite for safeguarding fundamental rights and decent working conditions, as required by national and international standards.

Although Sirva does not have direct operational control over working conditions at subcontractors, we acknowledge our responsibility to exercise due diligence in these cases as well. We therefore follow up on the risk area through dialogue with our suppliers, review of available documentation, and assessment of the need for additional measures. If necessary, we require clear division of responsibilities, insight into the use of subcontractors, and assurances that

suppliers comply with requirements related to wage and working conditions, HSE, and fundamental worker rights.

### Why Has the Risk Received This Assessment?

Sirva AS has established clear guidelines and systems for responsible business practices, and the work on human rights and decent working conditions is well integrated into the company's management systems. We have an overview of our own operations and primarily use suppliers operating in Norway or other low-risk areas, where historically there have been few cases of serious violations. Based on this, the probability of significant negative events is assessed as low. However, we still conduct regular due diligence assessments through dialogue, document collection, and the use of publicly available information to ensure that our suppliers comply with fundamental requirements for ethics, working conditions, and social sustainability.

The consequences are assessed as high if violations of human rights or decent working conditions were to occur – either in our own operations or with a partner. Such events can have serious consequences for affected individuals, lead to loss of income or health damage, and simultaneously damage trust in Sirva AS. This could involve violations of both legal requirements and internal guidelines, and may result in legal and financial consequences for the company. Therefore, we prioritize this work highly, even in cases where the risk appears limited.

### Measures to Manage Risk

#### ❖ Monitoring of Measures with Our Largest Suppliers

For all significant suppliers, initial information gathering is conducted from open and publicly available sources, including the companies' own reports, sustainability reports, ethical guidelines, public registers, third-party assessments, and other relevant external documentation. This collection provides a preliminary basis for assessing how suppliers work with responsible business practices, human rights, and decent working conditions.

Furthermore, regular and systematic reviews of received documentation from the most central suppliers are conducted. This includes, among other things, the suppliers' own due diligence assessments, internal guidelines, HSE systems, and other policy and management documentation. Through this work, in-depth

insights are created into how suppliers identify, prevent, and manage risks of violations of human rights, working conditions, and health, safety, and environment in their own operations and further in the value chain.

This continuous monitoring provides a better picture of how measures are actually implemented and adhered to in practice, and makes it possible to identify any weaknesses, deviations, or improvement needs in suppliers' work with responsible business conduct.

#### ❖ Issuance of Supplier Requirements

Specific supplier requirements are developed and distributed to all significant suppliers where relevant risks have been identified. The requirements clearly describe our expectations regarding respect for human rights, safeguarding decent working conditions, and systematic HSE work both in their own operations and in any subcontractor levels.

Through the written issuance of these requirements, a common framework is established that forms the basis for further collaboration. At the same time, it is clarified that these matters are an integral part of the contractual relationship and are continuously assessed in the follow-up of the supplier relationship. The requirements should also contribute to ensuring that suppliers review their own routines, systems, and practices to ensure compliance with the requirements set.

#### ❖ Utsendelse av spørreundersøkelse

For suppliers where there is limited or insufficient documentation through open sources, the supplier's own reports, or previously collected information, specific surveys are conducted. The purpose is to gather additional information on how the supplier actually works with decent working conditions, fundamental human rights, and HSE in practice. The survey covers topics such as working hours, wage and contract conditions, union organization, equal treatment, training, HSE organization, and use of any subcontractors.

The information received through the survey provides a more comprehensive basis for decision-making in situations where other documentation is limited. The results are actively used in further risk assessments, prioritizations, and follow-up activities with each supplier.

#### ❖ Conducting Spot Checks with Selected Suppliers

For certain suppliers with particular risks or where the information basis is assessed as insufficient, spot-check controls are conducted. The purpose is to verify and quality assure received information, as well as to uncover any deviations or weaknesses in compliance with the requirements.

The spot checks may include reviewing additional documentation, checking how routines are actually followed up in practice, or dialogue with the supplier about specific matters.

This control activity helps to strengthen the quality of the overall risk assessment and provides a basis for identifying the need for corrective measures or improvements in the supplier's work with human rights, decent working conditions, and HSE.

## HSE in Our Own Operations

Consequence , Probability 

### What Are We Uncertain About?

Employees at Sirva AS perform tasks related to moving, logistics, and relocation, which involves exposure to various workplace risks. In the operational part of the business, this may include physically demanding work, lifting and carrying heavy objects, working in various weather conditions, as well as risks related to transport and handling of valuable items in the customer's or third party's premises. There is also a risk of strain injuries due to repetitive movements and manual handling, especially during busy periods with high activity.

Additionally, Sirva AS has administrative positions and coordinating roles within project management and customer service, where there may be risks related to sedentary work, static working positions, and high screen strain. Psychosocial factors such as time pressure, high service levels, complex customer demands, and responsibility for coordinating assignments nationally and internationally can also lead to stress and reduced well-being over time.

These risk factors are to some extent inherent in the nature of the business and require systematic prevention and awareness in daily work. However, no significant uncertainty has been identified regarding compliance with HSE routines in our own operations. Sirva AS has established routines for risk assessment, training, reporting, and internal control, and HSE work is well anchored in operations. We have not registered serious violations of the working environment regulations, but see the need to continue and strengthen the systematic HSE work to further reduce both physical and psychosocial burdens.

Why Has the Risk Received This Assessment?

The workday at Sirva AS includes both physically operational work and administrative functions. In the operational part, related to moving and logistics, employees handle, among other things, heavy lifting, transport, and work in various environments and weather conditions. Although such tasks involve certain risk factors, the probability of serious HSE deviations is assessed as low. This is due to the fact that the business has established routines for risk assessment, training, and follow-up, and that there is a clear focus on safety and prevention in daily operations.

On the administrative side, the work includes customer dialogue, coordination, and project management, often with a high degree of complexity and time pressure. The risks associated with this mainly concern sedentary work, screen use, and psychosocial burdens over time. The probability of undesirable health outcomes is also assessed as low here, but not insignificant.

The consequence is assessed as medium. If there are shortcomings in the follow-up of health, environment, and safety, it may lead to musculoskeletal disorders, strain injuries, or reduced well-being. Although such events are rarely serious, they can lead to absenteeism, reduced work capacity, and negatively affect the working environment. This underscores the need for continued awareness and preventive measures, even where the immediate risk is assessed as low.

## Measures to Manage Risk

### ❖ Continue the Company's Work with HSE

Sirva AS will continue and strengthen the work with health, environment, and safety (HSE) in accordance with the company's established routines, experiences, and risk picture. Regular risk assessments are conducted both in operational activities and in administrative functions. We emphasize that safety rounds, training, deviation reporting, and internal control are carried out systematically and with high quality, adapted to the practical workday for employees in logistics, moving operations, customer service, and administration.

Our goal is to ensure that our HSE routines are relevant, understandable, and useful in practice, and that all employees have the necessary knowledge and involvement to actively contribute to preventive work. We will therefore

continue to invest in training, awareness, and facilitation related to both physical and psychosocial risk factors – from burdens associated with heavy lifting and demanding working positions to stress, time pressure, and high expectations in coordination and customer handling.

The desired effect of this work is to reduce the probability of serious HSE deviations and prevent both acute and long-term strain injuries. We want employees in all functions – whether they work with physical handling, transport, customer service, or support functions – to experience a safe, health-promoting, and inclusive working environment, where they are seen, cared for, and valued.

This work should also contribute to strengthening the psychosocial safety in the organization through clear frameworks, predictability, good communication, and opportunities for participation in matters concerning the working environment and well-being. This is particularly important in a business like Sirva AS, with varied tasks, high pace, and contact points across departments and locations.

Additionally, our systematic HSE work should ensure that we comply with the requirements of the Working Environment Act and other relevant regulations, while maintaining high trust among employees, customers, and partners. Good HSE work is a central part of our commitment to act as a responsible and sustainable employer and service provider.

Reporting Actual and Potential Violations of Human Rights and Decent Working Conditions in Sirva AS's Operations

We encourage employees and others to report actual or potential violations of decent working conditions and fundamental human rights. If you wish to report possible violations or have other questions about our work with the

Transparency Act, you can contact us here: [www.sirva.com](http://www.sirva.com) and [www.sirva.no](http://www.sirva.no) , or you can use our reporting channel which you can find here: [Case | FaceUp](#).

Adopted:

Date: 30.06.2025

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Marius Gijp  
Styrets leder

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Atle Skaarud  
Styremedlem

Signed statement can be obtained by contacting here: [Kontakt - Sirva.](#)