



Issued by:
NTEX AS

Created by:
Helen D. Jacobsen

Approved by:
Kåre Thuesen

Page no:
1

Document title:
Report Due Dilligence 2024 published 2025

Replaces Document

Created date:
2025-06-03

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Report on due diligence 2024 (published 2025)

Background:

In accordance with the Act on Enterprises' Transparency and Work with Fundamental Human Rights and Decent Working Conditions (the Transparency Act), all companies covered by the Act must publish an account of their completed due diligence assessments and risk analysis. This report applies to assessments and measures implemented in 2024, and is published in 2025.

Description of the business:

NTEX AS provides freight transport and freight forwarding services with associated terminal operations. The company carries out its assignments both with its own material and through purchased services. The suppliers are both Norwegian and foreign, and NTEX AS is a wholly owned subsidiary of NTEX AB in Sweden. Stena AB is the owner of NTEX AB. The report covers the Norwegian part of the business, NTEX AS.

Accountability:

The management team of NTEX AS is responsible for ensuring that guidelines and procedures are complied with locally in line with § 5 a of the Transparency Act. We have established a Code of Conduct, policies for human rights, equality, discrimination and the working environment. These are integrated into our daily operations and available on request.

In the event of indications of actual or potential violations of human rights or working conditions, those responsible will contact the supplier directly for dialogue. The NTEX Group's whistleblowing channel (WhistleB) also provides employees with a safe and anonymous channel for reporting concerns.

New developments in 2024:

In 2024, we acquired an electronic survey system (Complete Control/House of Control) to structure and streamline the follow-up of our suppliers. NTEX Group also employed a head of quality, environment and sustainability, which has strengthened the group's ability to follow up on the Transparency Act, among other things.



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Due diligence assessments of suppliers in 2024:

We sent out requests for self-declarations to 21 transport suppliers. Of these, we received responses from 57.14 %. It is a known challenge to get feedback from suppliers, but we followed up closely to gather the necessary information. No findings have been made that indicate a breach of the requirements of the Transparency Act. In the event of missing or insufficient answers, the suppliers are followed up with further contact and visits.

Focus on human rights and working conditions:

Our assessments have focused on working hours, employment conditions and minimum age. All providers that have responded have confirmed that their services are provided in accordance with applicable laws and regulations. The suppliers also confirmed knowledge of the requirements of the Transparency Act.

Environmental considerations:

Our assessments show that major suppliers have well-established routines for the environment and sustainability. Smaller players have less systematic documentation, but are in accordance with Norwegian legislation.

Self-declarations on pay and working conditions: As a follow-up to the due diligence assessments, we have obtained self-declarations from carrier suppliers on compliance with requirements for pay and working conditions. This has now been established as a routine, and is required when entering into new supplier agreements.

Internal risk assessments:

NTEX AS also assesses risk in its own operations. This is done through internal audits, management reviews, HR processes and AMU, as well as systematic follow-up through our ISO work. We have not identified specific risk areas for violations of labour rights in 2024, but consider this to be an ongoing focus area.

Salary and equal pay:

NTEX AS follows the principle of equal pay for work of equal value. Salary is determined according to objective criteria such as responsibility and experience. Due to the size and structure of the enterprise, a published analysis of gender-disaggregated wage statistics has not been carried out, as this may lead to recognisability. However, we have a conscious relationship to gender equality



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3

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and wage determination.

Areas for improvement:

We will improve response rates and documentation by strengthening reminders and follow-up, as well as increasing the use of supplier visits. We are considering using alternative interfaces where digital dialogue is not sufficient. Based on the number of suppliers, we consider it most appropriate to conduct complete surveys related to the Transparency Act every two years. In the years between survey mailings, we will prioritise direct contact and follow-up of suppliers who require closer dialogue, as well as work on improving internal systems and routines.

Conclusion:

NTEX AS undertakes to comply with the principles of the Transparency Act and works systematically to ensure ethical practices throughout the value chain. The work with due diligence, internal control and supplier follow-up is an integral part of our operations.

Signed:

Andreas Nikolic, Chairman of the Board NTEX AS
Kåre Thuesen, CEO NTEX AS

Signatures:

Andreas Hoel Nikolic
Andreas Hoel Nikolic (Jun 4, 2025 10:57 GMT+2)

Andreas Nikolic
Chairman of the Board, Ntex AS

A handwritten signature in blue ink, appearing to read 'Kåre Thuesen'.

Kåre Thuesen
General Manager, Ntex AS







Due Dilligence English

Final Audit Report

2025-06-04

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