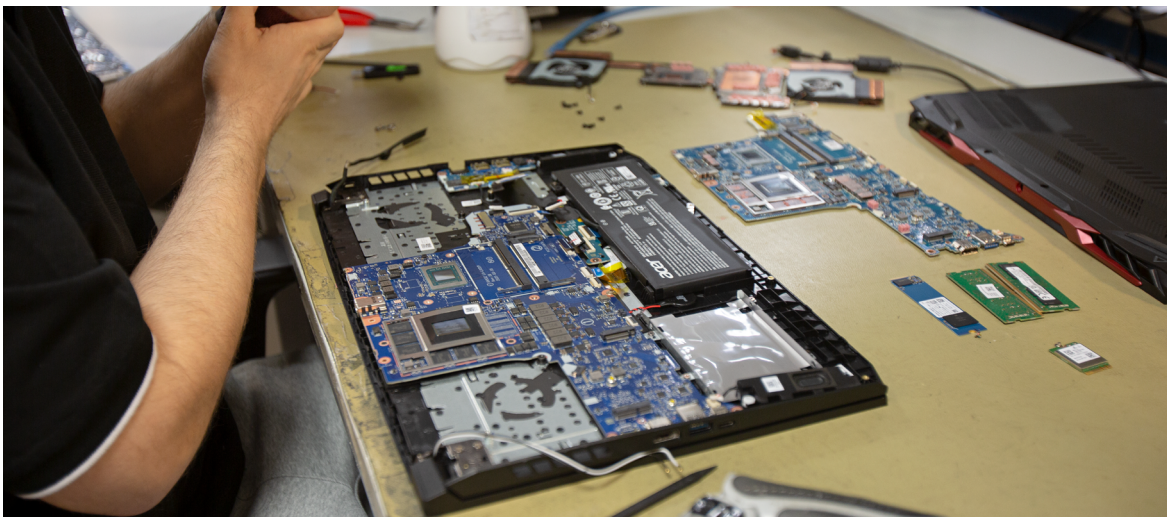


ANNUAL TRANSPARENCY REPORT

The Norwegian Transparency Act requires companies to carry out due diligence activities to ensure they are operating responsibly, respecting both human rights and decent working conditions. To comply with this act, the company needs to conduct human rights due diligence activities in their own operations as well as to their entire supply chain, including business partners. This means that Elcare Nordic AS needs to take steps to identify, address, prevent and limit violations of human rights or decent working conditions - whether potential or actual impacts. Required activities include implementing the appropriate policies, processes such as risk assessments, as well as providing remedy for violations. The Act requires companies to report on these activities and make this information available on their corporate websites

About us

Elcare Nordic AS is the leading consumer electronics service partner in the Nordics. We are a retail and brand independent service partner that offers a wide range of services and repairs related to consumer electronic products. Together with the other subsidiaries, we offer a unique Nordic concept for service and repairs of home electronics. Our 3 large central workshops and 23 smaller repair shops combined with an extensive transport and logistics setup serve the Nordic countries with a wide range of services. We are certified as a warranty repair center for most of the major IT and electronics producers. In addition to being a service partner to producers, retailers and other B2B entities, we also offer our services to the consumer market. Elcare Nordic AS is fully owned by Elkjøp Nordic AS and in its turn Curry's plc. Curry's plc issues an annual [Modern Slavery Statement](#) available on their website according to the requirements of the UK Modern Slavery Act.



RESPONSIBLE SUPPLY CHAIN

Elcare wants to take responsibility for promoting ethical trade in our supply chain, as a responsible business we are committed to using our scale and expertise to be a force for good in the world

Supply chains in the electronics industry are often long and complex, for a supplier to manufacture a product, raw materials and components are sourced from numerous sub-suppliers from different countries. It is part of our sustainability strategy to do what we can to influence actors in these complex supply chains to take responsibility for ensuring basic human rights and decent working conditions for everyone involved. As a service partner, we believe that we fulfill our responsibility best by cooperating with our suppliers, demanding acceptable control systems from those who have a direct impact on the supply chain.

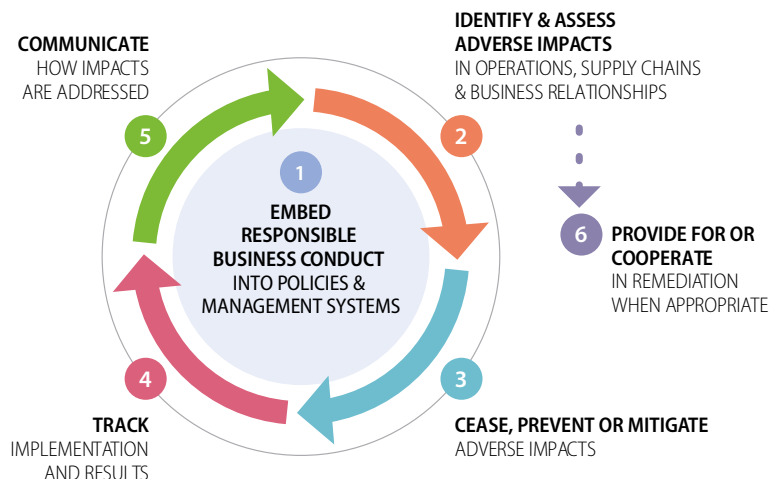
Our approach

We use the OECD model for due diligence assessments for responsible business conduct. The model has six steps that describe how companies should work towards more responsible and sustainable business practices. We strive for positive due diligence assessments, but that does not mean that our business will not have negative impact on people, society, and the environment, but rather that we as a company are open and honest about challenges in the supply chain and handle this in the best possible way in collaboration with our stakeholders.

Our expectations

We require that our suppliers comply with our standards and policies or that the supplier complies with corresponding standards as part of their management system, in order to ensure responsible sourcing. Since there are known industry risks of human rights violations and violations of workers' rights both in the extraction of minerals used in the products as well as during production in the factories, we align our policies accordingly. We therefore demand, among other things, that conflict minerals are purchased from suppliers on the Responsible Minerals Initiative (RMI) Conformant smelter & refiner lists and that the rights of the workers in the factories must be safeguarded in accordance with current international conventions. More information about our standards and policies can be found at currysplc.com

One of our focus areas is to ensure that as many of our suppliers as possible are certified through the international certification company EcoVadis. EcoVadis evaluate the supplier's performance in terms of environment, ethics, and social responsibility. Learn more about how we work at Elkjop.no



If we become aware of a serious violation in our supply chain, we investigate how the supplier will ensure that the violation is rectified and provide our support if this is required. In the event of repeated serious breaches, we will consider terminating the contract.



Mapping of risks

Our focus has been to risk assess our supply chain, identifying areas where there is potential for human rights and workers’ rights violations. For branded suppliers our focus is on tier 1 (our direct supply base). For indirect sourcing we mainly focus on high-risk tier 1 suppliers with some exception related to distribution services in the Nordics, where we cover both our collaboration partners as well as their subcontractors.

Risk assessments have been performed on product group level (ie. headphones, speakers, phones) or on type of services level (ie. transportation), to identify the risk of human rights and poor working conditions violations. Inherent risk is assessed according to the following risk factors:

- Country of production
- Whether conflict minerals are used in the products
- Whether dangerous chemicals are used in production
- Whether there are other conditions dangerous to health and safety
- What impact we have within this product category
- Other known industry factors

To assess the country risk, a model has been created incorporating information from two reports issued on a yearly basis “List of Goods Produced by Child Labour or Forced Labor” and “Trafficking in Persons Report”, issued by the U.S Bureau of International Labour Affairs as well as the U.S Department of State.

According to the risk model; China, Malaysia, and Vietnam are high risk, Turkey is considered medium risk, while Germany, Poland, Hungary, Slovenia, Slovakia, and Italy are considered to have a low risk of human rights violations, these are all countries that are part of our supply chain.

To determine the residual risk, suppliers are assessed based on knowledge of established control systems, [EcoVadis score](#) and experiences from factory visits or other interactions with the supplier. The assessments cover product and spare part procurement to our repair centers in Norway.

Managing risks

There are two factors that affect the risk of violations of human rights and worker rights in the supply chain for electronic products.

1. **Use of conflict minerals.** The majority of the products we repair consist of one or more conflict minerals. When we assess the risk associated with different product types in our due diligence assessments, conflict minerals are the single most important factor that increases the risk of serious human rights violations in the supply chain for our products.
2. **Working conditions in the country of production.** Electronic products are manufactured in countries where there are known violations of the ILO Convention’s requirements for working conditions and workers’ rights. In addition, the use of dangerous chemicals in production may be a health risk for factory workers.

During the reporting period, non-conformity associated with indicators of modern slavery has been identified in the supply chain of one of our brand suppliers. We will address this matter as part of our supplier dialog.

We have followed up on suppliers connected to the report issued in 2020, Uyghurs for Sale: “Re-education, Forced Labor, and Surveillance Outside Xinjiang”. This report documented that Uyghurs were working under forced labour conditions in several Chinese factories, including factories that are part of the supply chain of electronic goods. We will continue to address the risk related to forced labour going forward by engaging in supplier dialog.

Risks associated with services

In addition to risks associated with our products, we have assessed risks associated with the services we purchase. We have identified risks related to transportation. In this industry, there may be violations of employee rights, such as low pay, forced overtime and lack of employment contracts. In addition, exploitation of vulnerable groups can be a risk factor. During the reporting period, we have not identified violations of workers’ rights within our transportation and distribution services.

Risk associated with our own operations

We consider the risks related to our own operations of repair centers to be low. We have systems in place to ensure that working conditions are up to standards and that human rights are respected.



There is a solid recruitment process in place covering all locations, the process ensures that employment is freely chosen, that there are no underage workers and that our staff is paid a living wage. We practice freedom of association and the right to collective bargaining is respected.

We believe that it takes diversity of thought, culture, background, and perspective to create truly great customer experiences. Our company values states focus on empathy, diversity and ethical treatment and there is zero tolerance for discrimination practices. At our repair centers we are proud that our staff represents a multitude of nations, and we are committed to fostering an inclusive culture.

Supplier development

An important part of our work with responsible sourcing is to ensure that we use the most effective measures possible to influence our supply chain. To achieve this, we do most where we have the most influence, such as when we purchase services such as transportation. At the same time, we must help set demands for ethical trade even where we are further down the value chain from where the manufacturing takes place. That is why we also make demands for ethical and responsible value chains when we negotiate with large brand suppliers.

Key activities

During the past year we together with our parent company Elkjøp Nordic AS have established a system to receive and handle requests for information. Contact details are available on Elkjop.no, requests are handled by the compliance team in close collaboration with the business responsible.

During the last few months, we have been working on an update to our standard commercial contract. For next year we aim to communicate these changes to our suppliers along with our responsible sourcing policy. A collaboration with Slave Free Alliance (SFA) was also initiated and an audit of standard contracts used for last mile transportation was completed.

We have completed social audits in collaboration with our last mile transporters, focusing on working conditions in Norway, Finland, and Sweden.



Our audit set-up for these suppliers has also been reviewed by SLA, improvement recommendations have been provided. We are collaborating with the authorities and other stakeholders within the last mile transportation industry to ensure that we are well informed about developments. Among the actions taken this year, a monthly survey for last mile drivers was implemented focusing on working conditions.

We believe that the actions we take have a positive effect on both our employees and suppliers. We want to be a responsible employer as well as inspire our suppliers to work with responsible sourcing.

Moving forward

In FY 23/24, we aim to further improve our approach to responsible sourcing. Our key focus will be to continue our supplier dialogue, we will contact both the suppliers considered high risk as well as our strategic suppliers and ask them to provide information about

how they address risks in their supply chain. We will also continue to develop our partnership with Slave Free Alliance to improve our practices as well as continue to onboard and follow up on our EcoVadis certified suppliers.

When it comes to our indirect sourcing suppliers, our focus will be to expand our risk assessments to include even more suppliers. There will also be a focus on contract terms and communication of policies to our strategic partners as well as supplier dialog when this is deemed necessary.