



Sustainability Report

2025

Hallgruppen AS

Org. No.: 915 846 432

Message from the CEO

As CEO of Hallgruppen AS, I am pleased to present our sustainability report for 2025, reflecting a year of progress and adaptation.

A year of progress in a changing landscape

The past year has been one of progress and adaptation. We have strengthened our sustainability efforts across markets while continuing to deliver high-quality products with long-lasting value. Our focus remains on solutions that meet today's needs and anticipate tomorrow's challenges.

Navigating complexity with responsibility

The geopolitical landscape and evolving regulations are shaping the way we operate. Policies such as the Carbon Border Adjustment Mechanism (CBAM) and the Packaging and Packaging Waste Regulation (PPWR) are important frameworks that guide our environmental strategy. Staying ahead of these developments ensures compliance and positions us as a proactive, responsible partner.

Strengthening our foundations across markets

We achieved key certifications that reflect our commitment to environmental excellence. In Norway, our operations were recognized with the Eco-Lighthouse certification (Miljøfyrtårn), and in the UK we were certified to ISO 9001, -14001, and -45001. Both underscore our dedication to consistent, high-quality environmental management across borders.

Hallgruppen has completed its second EcoVadis assessment and has been awarded a Bronze Medal. This achievement marks an important milestone in our sustainability journey, demonstrating transparency, recognizing our sustainability efforts, and reinforcing our commitment to continuous improvement across key sustainability areas.

Responsible practices across our value chain

We are committed to being a trustworthy and responsible partner. Our operations are grounded in ethical business conduct, sustainability and quality, guided by frameworks such as the OECD Guidelines for Multinational Enterprises and the UN Global Compact principles.

To support this, we conducted comprehensive social audits across our supply chain in 2025. These reviews are vital in reinforcing compliance with our Supplier Code of Conduct and ensuring that all partners uphold the highest standards of human rights, safety, ethical business practices, and environmental responsibility.

Hallgruppen is committed to responsible business practices - continuously improving our impact across all operations

Building the future on strong values

Our progress is built on strong values: respect, integrity, and community. By combining innovation, compliance and sustainability, we aim to create lasting value for our customers, employees and society at large.

We look forward to continuing our journey, guided by responsibility and a commitment to a sustainable future.

Lars Dalgaard
CEO





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Basis for preparation

This sustainability report is our official reporting of Hallgruppen AS's environmental, social and governance (ESG) efforts for the reporting year 2025. The report is prepared on a consolidated basis, for complete list of subsidiaries with additional information, see Appendix 1. Overview of additional locations is on our website.

Hallgruppen considered the sustainability issues covered in this report applicable based on the materiality analysis conducted in accordance with the principle of double materiality. This analysis assesses both how sustainability-related factors impact our business and how our business activities impact people and the environment.

This report has for the first time been prepared in line with the **Voluntary Sustainability Reporting Standard (VSME)**, applying the Basic Module with selected disclosures from the Comprehensive Module see Appendix 4. As per VSME paragraph 10 we have included additional information to make sure we cover the full scope of our sustainability reporting in relation to our material topics. Therefore, we have maintained the **GRI Standard 2021** see appendix 5, to ensure a clear, transparent and structured presentation of our performance and commitments.

Additionally, the "Workers in the Value Chain" chapter under Social has been retained, as it is important in terms of our work with the Norwegian Transparency Act, and demonstrates our commitment to fundamental human rights and decent working conditions across the value chain in line with our commitments.

We apply the GHG Protocol as the basis for reporting greenhouse gas emissions, ensuring a structured, consistent and transparent approach to the identification, measurement and management of our carbon footprint. Our climate accounting encompasses all entities and locations within the Group that fall within our thresholds for climate accounting. Previous years emissions and waste data have been restated.

The report has been reviewed and approved by the Chief Executive Officer and reflects the Group's commitment to responsible, ethical and sustainable business practice.

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Legal form:	Limited liability company
Size of the balance sheet:	Unavailable at the time of reporting
Turnover of approximately:	1.215 bn NOK
Number of employees (headcount):	174

Certifications, labels and commitments

Certifications and labels

Compliance assessments and a formal commitment to applicable laws and regulations are integral parts of our current management system.

ISO-certification

The Group has been in the process of aligning its management system with the requirements for future ISO 9001- and ISO 14001-certification.

2nd of April 2025, our UK subsidiary, Hallgruppen Ltd., became the first company in the Group to achieve ISO 9001, ISO 14001, and ISO 45001 certification issued by Interface NRM Ltd.

Eco-Lighthouse certification

19th of January 2026, Hallgruppen AS in Norway obtained Eco-Lighthouse certification issued by Certnor AS, based on the work carried out during the previous year.

EcoVadis

Hallgruppen has been assessed for the second time in accordance with EcoVadis, one of the world's most recognized sustainability assessments, based on criteria within the environment, labor and human rights, business ethics and sustainable procurement. This confirms our commitment to sustainability and continuous improvement.

With a score of 67 out of 100, Hallgruppen has been awarded the EcoVadis Bronze Medal. This achievement places us among the top 35% of all companies assessed by EcoVadis worldwide. This is an important milestone in our sustainability journey and a recognition of the efforts we have made so far. We view this achievement as both an acknowledgment of our current performance and a motivation to continue improving. We will use the assessment results as a valuable tool to identify opportunities for further development and are actively implementing measures to strengthen our sustainability performance going forward.

Hallgruppen has set a target for our EcoVadis performance: Silver by 2030 and Gold by 2035.

Commitments

Hallgruppen participates in the following industry- and environmental organizations and promotes industry interests and Sustainable Development Goals.

UN Global Compact

Hallgruppen has been a member of the UN Global Compact (UNGC) since 2022, which is the UN's initiative for sustainable and socially responsible business practices, and the world's largest corporate sustainability initiative. The UN Global Compact is based on ten principles that all companies and organizations are encouraged to follow. Being a member of the UN Global Compact, the company communicates how we contribute and operate in line with these ten principles in the areas of the environment, human rights, labour rights and anti-corruption.

Green Point Norway

Hallgruppen has since 2024 been a member of Green Point Norway. As an importer, we are responsible for the packaging that comes with our products. Membership means that we pay a fee to Green Point Norway to help ensure that packaging waste is handled in an environmentally friendly manner.

Sustainable Development Goals

Through our work, we deliver on selected UN goals, further information Appendix 3.





About Hallgruppen

Hallgruppen is a leading European supplier of temporary and permanent structures, tents, and buildings.

Hallgruppen is a leading European supplier of temporary and permanent structures, tents and buildings. Since our establishment in 2015, we have grown rapidly with a turnover of approximately 1.215 billion NOK in 2025, over 174 employees, headquarters in Norway, 22 offices in 8 countries. We have a strong international presence, and products are delivered to around 80 countries on all continents.

Vision and values

Through our vision 'Cover anything. Anywhere', Hallgruppen aims to achieve global presence with our products through innovative, flexible and sustainable solutions.

We will achieve this through our values of **respect**, **community** and **honesty**:

Respect for each other, our customers and our products. A core value of our organization is embracing differences.

Community fostering a collective mindset where we see solutions instead of challenges, with a common purpose to achieve high performance levels in an environment where collaboration thrives.

Honesty we take pride in our responsibility to our customers and stakeholders. By consistently delivering on our promises, we foster trust, respect and dependability.



Start-up 2015

Head office in Frogner, Norway



1.215 billion

Sales in 2025, NOK



8 Countries

22 Regional Offices



174 Employees

Engineering, production and assembly

Business areas and markets

Core Product Groups

Core product groups include temporary and permanent structural solutions. We develop and deliver both standardized and customized solutions designed to meet specific customer needs, supported by an in-house engineering department.

In addition, we also offer complementary products such as tarpaulins, furniture, and accessories. Services span the full value chain, including design, engineering, delivery, installation, and project support, with a strong focus on flexible, innovative and sustainable solutions.

Significant markets

Our significant markets and customer base are B2B-markets such as industrial and commercial, serving both public and private sector clients and emergency use.

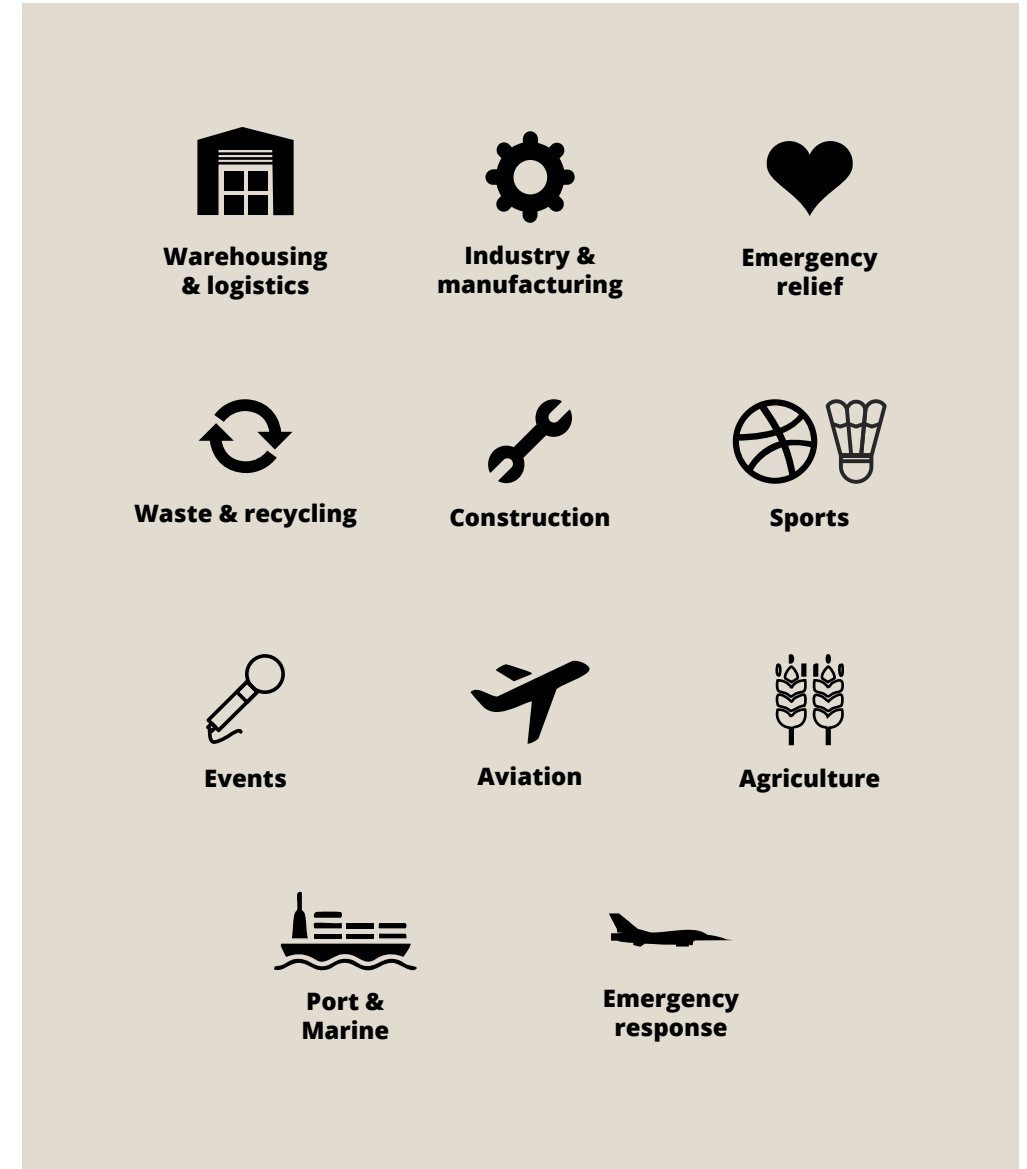
Our solutions are delivered across a wide range of industries and applications, including warehousing and logistics, industry and manufacturing, construction, waste and recycling, agriculture, ports and marine, aviation and sports.

The company is also active in event infrastructure, emergency relief and emergency response markets, supplying rapid-deployment and long-term solutions in critical situations.

Main Business Relationships

Our main business relationships are centered on long-term collaboration with key suppliers, customers and distribution partners. The company works closely with a selected network of strategic suppliers providing structural components, textiles, steel, aluminum and complementary products.

These relationships are managed through defined quality, environmental and sustainability requirements, including adherence to Hallgruppen's Supplier Code of Conduct.



Double materiality analysis

Process for identifying material topics

The double materiality analysis forms the connection between Hallgruppen's strategy and business model to applicable sustainability issues.

The process for identifying and analyzing the material topics for the Group was conducted in 2024 and is still up to date. It was important for identifying and prioritizing our key Sustainability issues and forms the basis for the company's strategic decisions and direction going forward.

The work was carried out by identifying actual and potential negative and positive impacts within ESG and human rights; upstream, downstream and in our own operations.

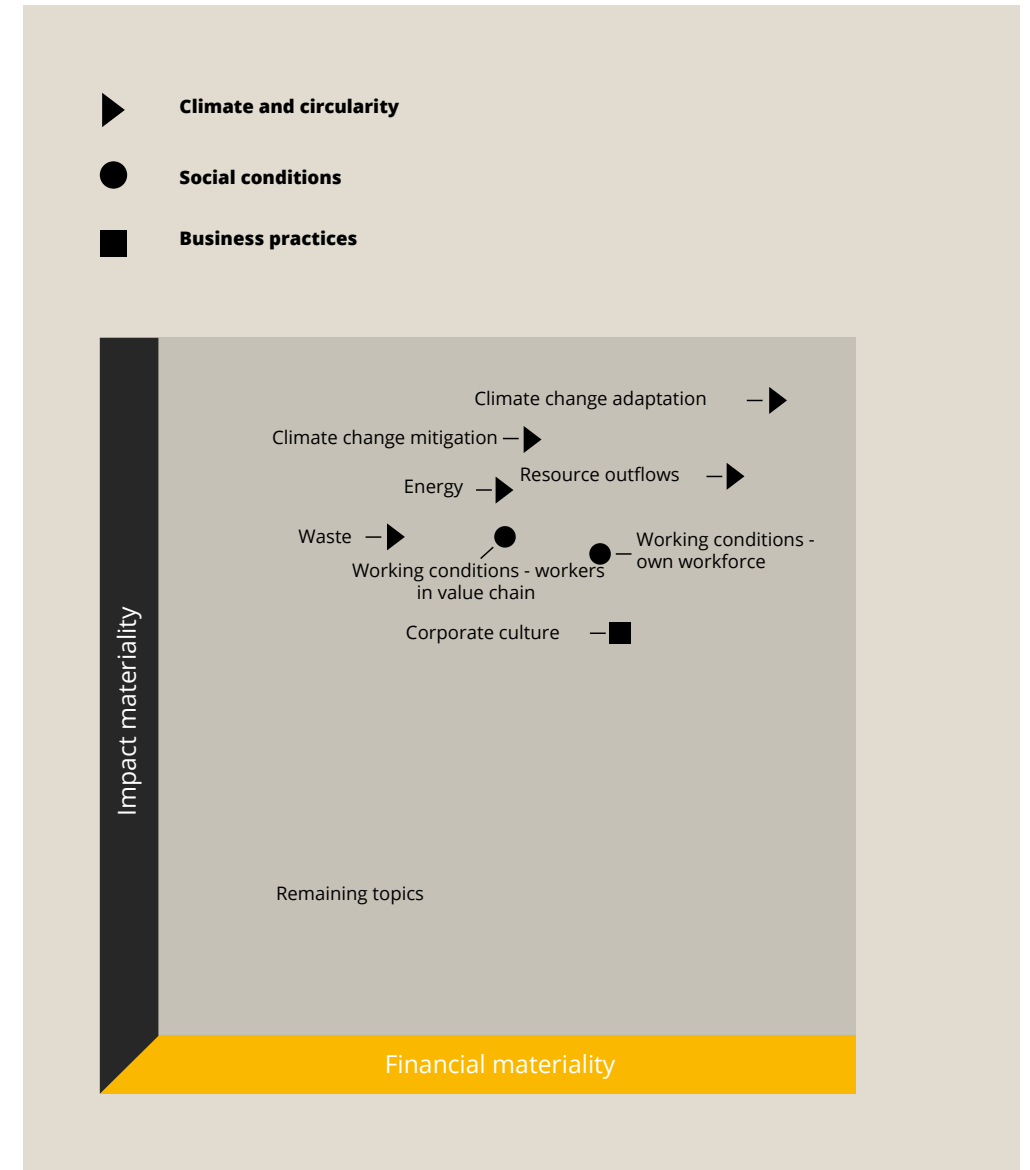
The implementation and management of the process was primarily carried out by a central working group consisting of key employees. Based on the Group's stakeholder mapping, various stakeholder dialogues were conducted to gather information on relevant topics. Each topic was then analyzed, assessed and ranked.

For internal stakeholders, individual meetings were initiated with key internal employees in various fields. For external stakeholders, documentation was reviewed and information was gathered through ongoing dialogue and meetings with customers, suppliers and industry associations. See overview of our most important stakeholders and how we manage and engage with them in the table in Appendix 2.

List of material topics

1. Climate change - Adaptation
2. Climate change - Mitigation
3. Climate change - Energy
4. Circular economy - Resource outflow
5. Circular economy - Waste
6. Own workforce - Working conditions
7. Workers in value chain - Working conditions
8. Business conduct - Corporate culture

This demonstrates the broad focus on sustainability among our stakeholders. Although issues such as gender equality and discrimination, forced and child labour and anti-corruption were not identified as top material topics, they are in line with the Group's strategy and relevant to certain stakeholders, and we therefore report on them voluntarily.



Governance and Management of material topics

The CEO holds primary responsibility for sustainability and all supporting policies across the Group.

Group Sustainability Manager, together with the Head of HSEQ & Sustainability, is responsible for ensuring that sustainability is in line with the overall Group strategy and in compliance with applicable laws and regulations in the areas in which we operate.

The Group management system forms the basis for management and integration of material sustainability topics within climate and environment, social matters, and governance and business practices. These topics are operationalized through policies, guidelines and operating procedures that reflect the Group's commitment to responsible business conduct, continuous improvement and adaptation. Management and operationalization are delegated across defined roles with responsibilities, supporting policies and procedures.

The Group Sustainability Manager:

Overall responsibility for all topics of sustainability, Special attention on topics like climate, environment, circular economy, and sustainability matters in the upstream value chain, including supplier follow-up and due diligence. As well as all Sustainability reporting activities.

The Group HSE Manager:

Oversees Health- and safety matters with follow-up performance.

The Group HR Manager:

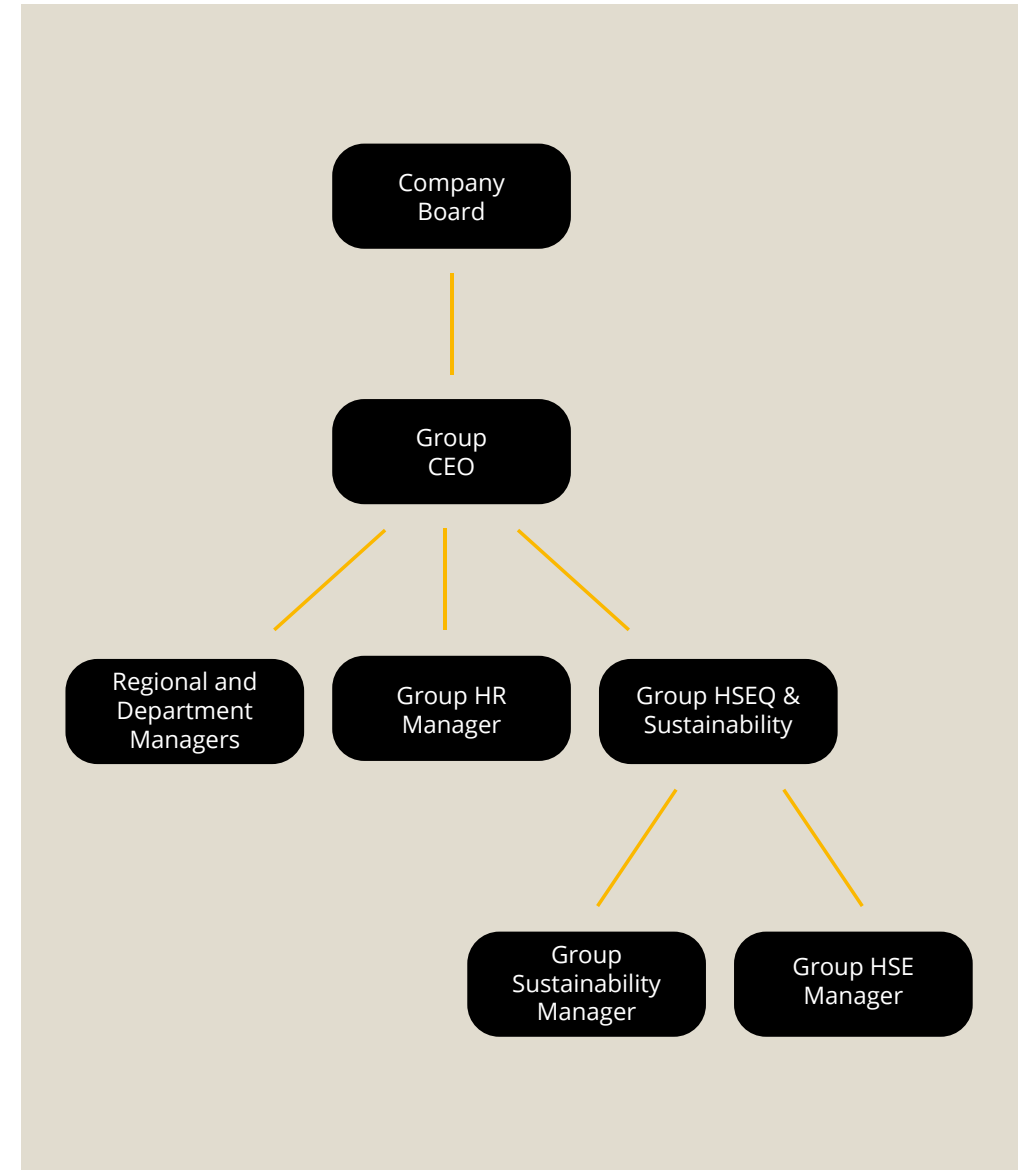
Oversees areas related to employment conditions, ethical guidelines, freedom of association, collective agreements, training, and other matters related to equality, inclusion, and non-discrimination.

Regional and Department Managers:

Ensuring that policies and procedures are applied effectively within their respective legal entities and departments.

Together, they develop, implement and monitor measures to improve our environmental, social and governance performance. This includes strategies for climate and the environment, waste reduction, responsible procurement and compliance with relevant standards, laws and regulations. Through systematic follow-up and evaluation, they ensure that our sustainability practices are in line with our core values and contribute to long-term value creation.

The policies are reviewed on an annual basis to ensure they remain current and effective.

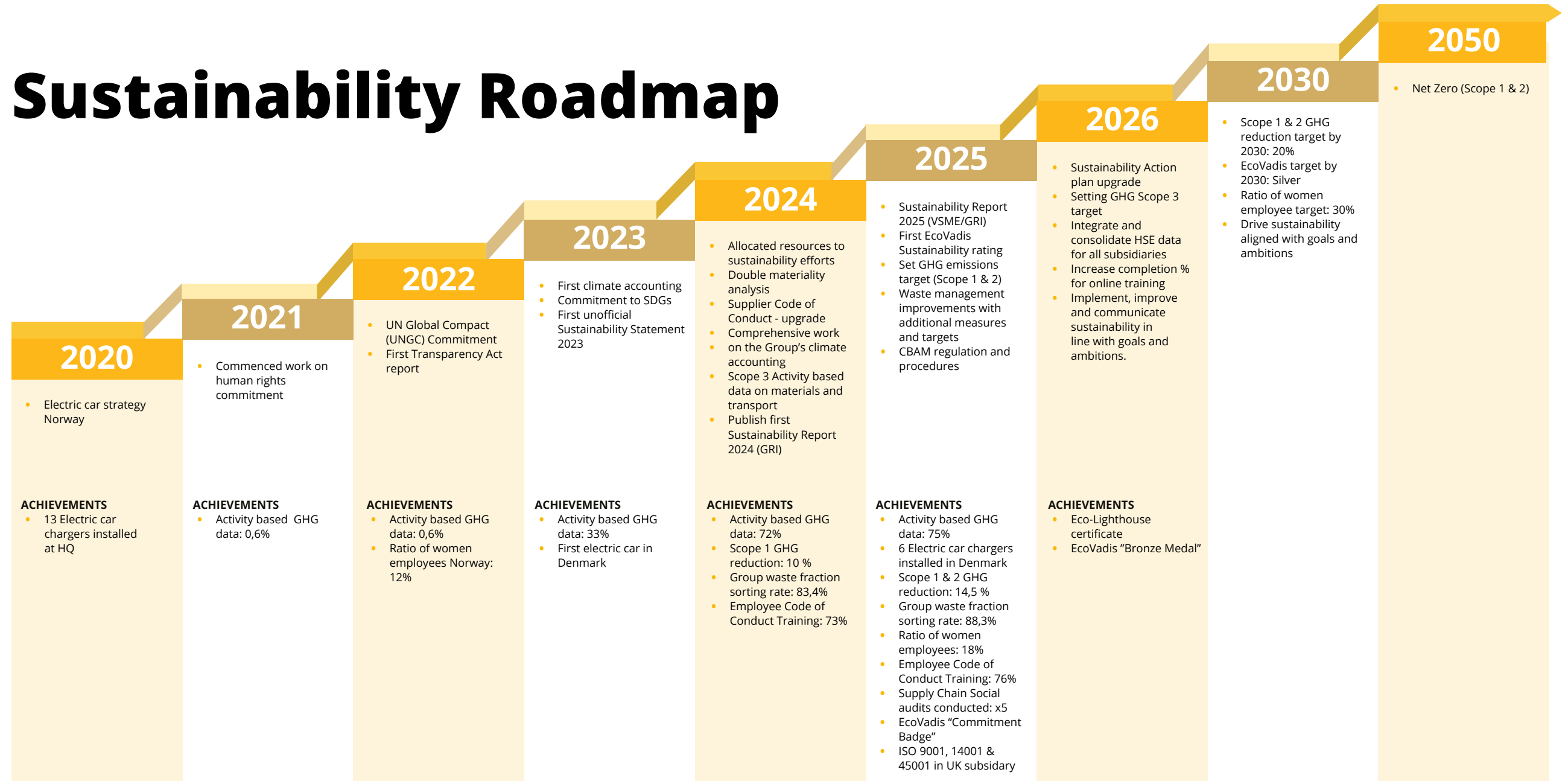


Practices, policies and future initiatives

Hallgruppen has established a range of practices, policies, and forward-looking initiatives aimed at supporting the transition towards a more sustainable economy. These efforts reflect the company's commitment to integrating sustainability into its operations and long-term strategy. A more detailed overview of these practices, policies, and planned initiatives can be found within the relevant topic-specific chapters.

Climate Change	Circular Economy	Own Workforce	Workers in the Value Chain	Business Conduct
<p>Hallgruppen practices: Our environmental policy covers all relevant aspects. Climate resilient solutions, Tracking emissions Scope 1, Scope 2 and Scope 3, and energy use. Supplier management, Environmental certifications.</p>	<p>Hallgruppen practices: Our environmental policy covers all relevant aspects. Improving products circular design and reuse ability, supplier management, improved waste reporting and waste management.</p>	<p>Hallgruppen practices: We have well integrated policies, enforced with online training. We have consolidated most of the data for the Group to include all subsidiaries.</p>	<p>Hallgruppen practices: Use the OECD methodology to conduct due diligence, including necessary policies, risk assessment, address findings and implement necessary measures.</p>	<p>Hallgruppen practices: Hallgruppen has a zero-tolerance policy for bribery and corruption. Ethical business practices and anti-corruption are integrated into both Code of Conduct and Supplier Code of Conduct.</p>
<p>Publicly available policies and reports:</p> <ul style="list-style-type: none"> Hallgruppen Sustainability Report Environmental Policy 	<p>Publicly available policies and reports:</p> <ul style="list-style-type: none"> Hallgruppen Sustainability Report Environmental Policy 	<p>Publicly available policies and reports:</p> <ul style="list-style-type: none"> Hallgruppen Sustainability Report Hallgruppen Code of Conduct Whistleblowing Gender Equality Statement 2024 (Only Norway) <p><i>Separate ESG policies:</i></p> <ul style="list-style-type: none"> HSE policy Employee Handbook 	<p>Publicly available policies and reports:</p> <ul style="list-style-type: none"> Hallgruppen Sustainability Report Hallgruppen Code of Conduct Supplier Code of Conduct Whistleblowing <p><i>Separate ESG policies:</i></p> <ul style="list-style-type: none"> Supplier onboarding procedure Supplier audit procedure Audit checklist 	<p>Publicly available policies and reports:</p> <ul style="list-style-type: none"> Hallgruppen Sustainability Report Hallgruppen Code of Conduct Supplier Code of Conduct <p><i>Separate ESG policies:</i></p> <ul style="list-style-type: none"> Employee Handbook
<p>Targets:</p> <ul style="list-style-type: none"> Net-zero emissions by 2050. 2030 target (Scope 1 & 2): 20% reduction in emissions. Electric car strategy. <p>Future initiatives:</p> <ul style="list-style-type: none"> Setting Scope 3 target. Further develop our action plan on Sustainability 	<p>Targets:</p> <ul style="list-style-type: none"> Ratio of Non-Hazardous waste. Waste volumes with disposal operations. Group waste fraction sorting rate: 80%. Waste fraction sorting rate per unit, country. Kilo per m2. <p>Future initiatives:</p> <ul style="list-style-type: none"> Continue to look into waste and recycling solutions associated with coated fabric. Further develop our waste monitoring and targets. 	<p>Targets:</p> <ul style="list-style-type: none"> Ratio of women employed by 2030: 30% Zero work-related accidents Online training 100% <p>Future initiative:</p> <ul style="list-style-type: none"> Continue to consolidate and track own workforce data for all subsidiaries. 	<p>Targets:</p> <ul style="list-style-type: none"> Yearly risk assessment % of spend High risk suppliers % of spend Supplier Code of Conduct signing % Social Audits at Selected Suppliers <p>Future initiative:</p> <ul style="list-style-type: none"> Subcontractor Installation Control Procedures On-Site Social Audits at Suppliers 	<p>Targets:</p> <ul style="list-style-type: none"> Zero anti-corruption violations and anti-bribery laws breaches Employee Code of Conduct (including anti-corruption) online training: 100%
<p>Accountable for implementation: Sustainability Manager</p>	<p>Accountable for implementation: Sustainability Manager</p>	<p>Accountable for implementation: Group HR Manager / HSE Manager</p>	<p>Accountable for implementation: Sustainability Manager</p>	<p>Accountable for implementation: Head of HSEQ and Sustainability</p>

Sustainability Roadmap



Two bulk storage buildings at Sjursøya

- built without concrete foundations

A shared site with higher demands

When Oslo Havn (Oslo Harbour) reorganized its sites at Sjursøya, two competing salt and minerals importers were relocated onto the same area. Both ended up with less outdoor space but a greater need than ever for high-volume storage, as rising freight costs had made it more economical to import salt in larger batches. A portion of the salt is also packed in bigbags for export.

The site made this difficult. The terrain dropped around 1.5 meters from back to front, with a quay edge directly in front and a main road behind, so the ground could neither be raised nor lowered. Traditional excavation for a concrete foundation would have been costly, and as an old harbor area, Sjursøya carried a high likelihood of unknown subsurface conditions.

Precision-built for uneven terrain

Rather than reshaping the ground to fit the buildings, Hallgruppen designed the buildings to follow the ground. The entire site was 3D-scanned, and each structure was shaped to match the terrain exactly. Anchoring was carried out with ground spikes instead of concrete, which removed the need for a concrete foundation entirely and meant no excavation or ground intervention beyond the spikes themselves.

The two uninsulated bulk storage buildings measure 45 × 65 × 11 m and 55 × 60 × 11 m, totaling 6,225 m² of covered storage. Both are clad in high-grade Serge Ferrari fabric and

built around 6-meter solid timber bulk walls, dimensioned for the pressure of fully loaded salt so it can be stacked higher and the reduced footprint used efficiently. Motorized high-lift doors, entrance doors on all sides, a snow-protection system, and a complete electrical installation were included to support daily operation.

The two projects ran in parallel and took around 25 weeks from order to completion, with 7 weeks of on-site erection timed to the Norwegian summer holidays, when the area was clear of salt and disruption was kept to a minimum.

The decision to avoid concrete proved even more significant during construction: beneath the surface lay an old concrete foundation up to one meter thick, an old cellar, and an area of solid bedrock. A conventional foundation would have turned these into major cost overruns and delays. With ground-spike anchoring, they were handled without added cost.

A documented lighter footprint

Both operators now have fully operational storage that gives them the capacity they needed. The environmental outcomes are documented independently by Rett Miljø (September 2025): total construction waste across both buildings was 12,600 kg, or 2.02 kg per m² of covered floor area, with a sorting rate of 90.32%. The largest fraction was clean steel (6,680 kg), followed by clean timber (4,000 kg). Most significant of all is what was never used: zero cubic meters of concrete foundation, and no excavation of the site.



2.02 kg/m²
construction waste

90.32%
waste sorting rate

0 m³
concrete foundation

6,225 m²
covered storage delivered



Environment

Hallgruppen is strengthening its focus on climate and circularity across operations, supply chains and products. Climate-related sustainability topics are embedded in our management system and supported by clear policies and procedures, reflecting our commitment to act on climate change.

Operationally, we optimize material use, monitor waste and emissions - key steps in reducing our climate impact and building a more sustainable future.

Impact, risk and opportunity

Climate change and climate risk C4-57

- Climate intensive resources and materials, as well as climate events affecting material markets.
- Higher price on resources and materials.
- Increased regulations related to climate change.
- Changes in customer expectations.
- One-sided focus on financial considerations in supplier management may hinder climate adaptation.
- Products designed for climate change:
 - Addresses changing needs as a result of climate hazards
 - Durable and climate-resilient products
 - Energy-efficient solutions can contribute to reducing energy consumption for customers
- Slow transition to renewable energy in own operations, but mainly in supply chain

C4-58

Hallgruppen are and will continue to be faced with challenges and risks related to climate change, particularly related to climate risks such as physical- and transition-related factors through short-, medium- and long-term horizons. With transition-related risks being high in short- to medium-term, as physical-related risks are lower short-term, but expected to increase in the long-term.

This was assessed as part of our materiality analysis covering upstream, own business and downstream operations. There may be a need to review the double materiality analysis related to climate risk to ensure it is conducted thoroughly enough, particularly in the absence of an in-depth climate risk assessment. This is evaluated on an annual basis.

Circularity, resource use and waste

- Higher demand for recycling, and transition to circular principles
- Durable and reusable products that can be repaired.
- Limited recycling solutions for certain materials, such as coated fabric is a challenge.

Overall, a lack of climate adaptation and mitigation measures, as well as resource use and waste may lead to challenges, both in terms of compliance with current and future regulations, ensuring sufficient access to resources and waste disposal options to stay ahead in the green transition.

Policies

Hallgruppen's **environmental policy** highlights the core areas for environmental action:

- Climate Change Mitigation: Reducing climate impact in our own operations and in our value chain.
- Climate Change Adaptation: Protecting the environment by delivering solutions adapted to climate change and environment.
- Energy: Prioritizing renewable energy and sustainable practice in supply chain. Deliver energy-efficient solutions to our customers.
- Circularity, resource use and waste: Transitioning to a circular economy with efficient use of materials, better resource utilization and waste minimization.

Hallgruppen's environmental policy is communicated through the company's management system and through our yearly Sustainability Report and applies to all employees and operations across the Group. It underlines a shared commitment to sustainable practices and adherence to applicable laws, regulations and legal requirements.

The Sustainability Manager oversees its implementation. Regional managers are tasked with ensuring the policy is applied effectively within their respective legal entities and departments. The policy is reviewed on an annual basis to ensure it remains current and effective.

Hallgruppen also expects its suppliers to actively consider environmental impacts in their operations. Suppliers are required to comply with relevant national and international environmental laws and standards, and maintain procedures that minimize negative environmental effects, support sustainable resource use, reduce greenhouse gas emissions and minimize waste. Further guidance is provided in Hallgruppen's Supplier Code of Conduct.

Climate change

Actions and resources in relations to climate change

Hallgruppen's resilient solutions for climate change

We have the opportunity to make a positive impact through our solutions and needs arising from climate hazards.

Hallgruppen's products are designed to be highly flexible, with lasting durability and climate resilience that can withstand climate challenges. Through close collaboration between our in-house engineers and customers, each solution can be tailored to specific functional, technical, and site-related requirements, such as ground movement. This allows the products to be constructed for a wide range of applications, ensuring they meet both current needs and future demands arising from climate change. The structures can often be dismantled and moved, and require less groundwork, which minimizes the environmental impact compared to traditional buildings.

Some of our specialized solutions include:

- **Temporary and flexible fabric covered structures** are designed to provide reliable protection under demanding weather conditions. These solutions are highly flexible and can be adapted to a wide range of applications, ensuring functionality even in challenging environments.
- Our **weather shelters** enable construction activities to be carried out year-round by protecting worksites from wind, snow, and precipitation.

Solutions such as **snow-lifting tarps** make it easier to cover construction areas and efficiently remove accumulated snow, improving safety and productivity on site.

- Hallgruppen also provides **temporary solutions for accommodation and storage**. These solutions are designed to maintain stable indoor conditions and meet operational requirements, even in cold or variable climates.
- Hallgruppen's **energy-efficient solutions** are designed with energy efficiency in mind. By optimizing insulation, material use and structural design, the products can contribute to reduced customers' energy consumption. Our development of products with low U-value further enhances thermal performance by minimizing heat loss, supporting both reduced operational costs and broader sustainability and climate goals.
- **Engineered solutions for demanding conditions** that can withstand ground movement and other challenging site conditions. By combining robust design with adaptable construction methods, Hallgruppen delivers temporary solutions that are durable, reliable and fit for purpose.
- Hallgruppen offers products and services that meet the needs of customers in exposed areas, including:

- ✓ **Emergency relief**
- ✓ **Defence sector**
- ✓ **Construction industry**





Supplier Management

We work with our key suppliers on green transition, through the below initiatives:

Supplier onboarding procedure

Our supplier onboarding process is designed to ensure compliance with product, quality and sustainability requirements. This includes verification of product specifications, industry standards, operation and maintenance documentation, safety data sheets, LCA/EPD information and Supplier code of conduct signing. This is mainly control criteria for new suppliers, but it is also occasionally used for existing suppliers to verify that they are accordingly.

Risk profiles are reviewed to determine whether social and environmental audits are required. Supplier innovation and adaptability are also evaluated, including their sustainability initiatives and potential for future environmental documentation.

Environmental Product Declarations (EPDs) are required for all key components

We require EPD from our most important suppliers on significant material for our main products. This provides transparent information on the environmental impacts of components we source from our suppliers, **including greenhouse gas emissions, energy use and recycled content in the products.**

At Hallgruppen our suppliers are expected to improve energy efficiency and reduce emissions across their value chain. The EPDs, as well as other emissions data to quantify emissions and energy use, are used to identify hotspots and push for change.

It also makes our Scope 3 input data more accurate and gives us the information we need to work actively with our top suppliers to reduce emissions. We seek to strengthen our supply chains readiness for regulatory frameworks such as the EU CBAM, which further links product emissions to cost and compliance obligations.

We also use this EPD data in our own LCA-tool making the emissions for our structures, transparent to our customers.

Other environmental requirements for our Suppliers

We set clear environmental expectations for our suppliers through our Supplier Code of Conduct to ensure alignment with our strategy and sustainability goals. These requirements include:

- **Hazardous Materials Management:** Suppliers must identify and manage hazardous materials to ensure their safe handling throughout production, storage, recycling, reuse, and disposal.
- **Handling of Waste, Resources Disposal and Recycling:** Suppliers should promote sustainable resource management by minimizing waste and emissions through responsible disposal, recycling, material substitution and circular practices.
- **Responsible energy use:** Suppliers must prioritize energy efficiency, reducing unnecessary consumption and, where possible, increasing the use of renewable energy sources.
- **Responsible Wood Sourcing:** While Hallgruppen is not FSC- or PEFC-certified, we only source wood products from suppliers and sawmills that hold these certifications.

Environmental Management System

Improving our Groups management system to be able to meet new regulations, customer expectations, develop our strategy and way of working to incorporate climate change-related matters in our strategic decision, supplier management and operations. This was done by ISO certifying our UK subsidiary in 2025 and the Eco-Lighthouse Foundation certification for Hallgruppen AS in beginning January 2026, which is deemed a recognized environmental management system in Regulation (EC) no. 1221/2009 article 45. We continue our journey to ISO-certify our Norwegian Mother Company.

Electric vehicle strategy

Hallgruppen's transition to electric vehicles is crucial in achieving reduced emissions over time. As early as 2020, the company installed its first 13 electric vehicle charging stations at its headquarters, and in 2025 Hallgruppen Denmark installed 6 more electric vehicle charging stations.

Hallgruppen has progressively expanded its electric fleet, in the recent years, and by 2025, 19 out of 44 vehicles in Hallgruppen Norway are electric. In 2023, the company's Danish subsidiary also initiated its transition, and by 2025, 5 out of 15 vehicles are electric.

Hallgruppen locations	Electric vehicles 2025
Denmark	5
Norway	19
Total	24

Energy management

We have worked to improve our internal energy management with improved measurements. We aim to continue this improvement to better understand where energy is used and where improvements can be made. It also supports transparent reporting and informed decision-making, allowing management to set targets and measure progress.

Continuing development of our environmental goals

In 2025 Hallgruppen committed to near- and short-term targets on scope 1 and 2 and implemented these in our management system. Moving forward Scope 3 target will be aligned, and there is a need to further develop our current action plan on Sustainability to meet the growing demand for transparency and better tracking of targets and improvements.

Further, the focus in 2026 will be to continue the implementation and compliance with Carbon Border Adjustment Mechanism (CBAM) with attention on reducing supply chain emissions.

GHG reduction targets and climate transition

Hallgruppen is committed to reducing emissions and having established the 2024 baseline for our GHG emissions. In 2025, the primary focus has been on defining both near- and long-term reduction targets, with particular emphasis on Scope 1 and Scope 2 emissions.

Emission Reduction Targets C3-54

100% of Scope 1 and 2 emissions are covered by the target.

Long-term target:

- Hallgruppen aims to achieve net-zero emissions by 2050.

2030 target (Scope 1 & 2):

- 20% (107,63 tCo2e) reduction compared to the baseline year 2024.
- With an average annual reduction of 4% (21,5 tCo2e).

Key measures

Transition to electric vehicles is crucial in achieving emissions reduction over time. However, due to the driving pattern on some of the company vehicles, we might need to find other solutions to support this transition. This will also have to be complemented by improvements in operational efficiency and enhanced energy management to reduce future energy consumption.

Moving forward we expect to move forward with setting Scope 3 target in 2026 connecting our current actions related to value chain to our GHG emissions.

C3-55 C3-56

Hallgruppen operates in a high climate impact sector. Currently we have no standalone transition plan for climate change mitigation, but we are progressing towards a comprehensive action plan as a part of our management system. This approach will strengthen our overall sustainability transition strategy and guide coordinated actions across operations and our value chain.

Energy and greenhouse gas emissions

Energy consumption and mix

We monitor our energy consumption across our main operations, including main offices, warehouses, production facilities, electrical vehicle charging and fuel for our own vehicles.

Our energy consumption mainly consists of non-renewable electricity and fuels. The Group's total energy consumption in the reporting year was **2.897,89 MWh**.

The reduction in energy use from 2024 to 2025 is mainly due to decline in use of fossil vehicles and reduced consumption of natural gas in 2025, but also a result of greater adoption to electric vehicles, which are charged both on-site and at external locations.

Electricity

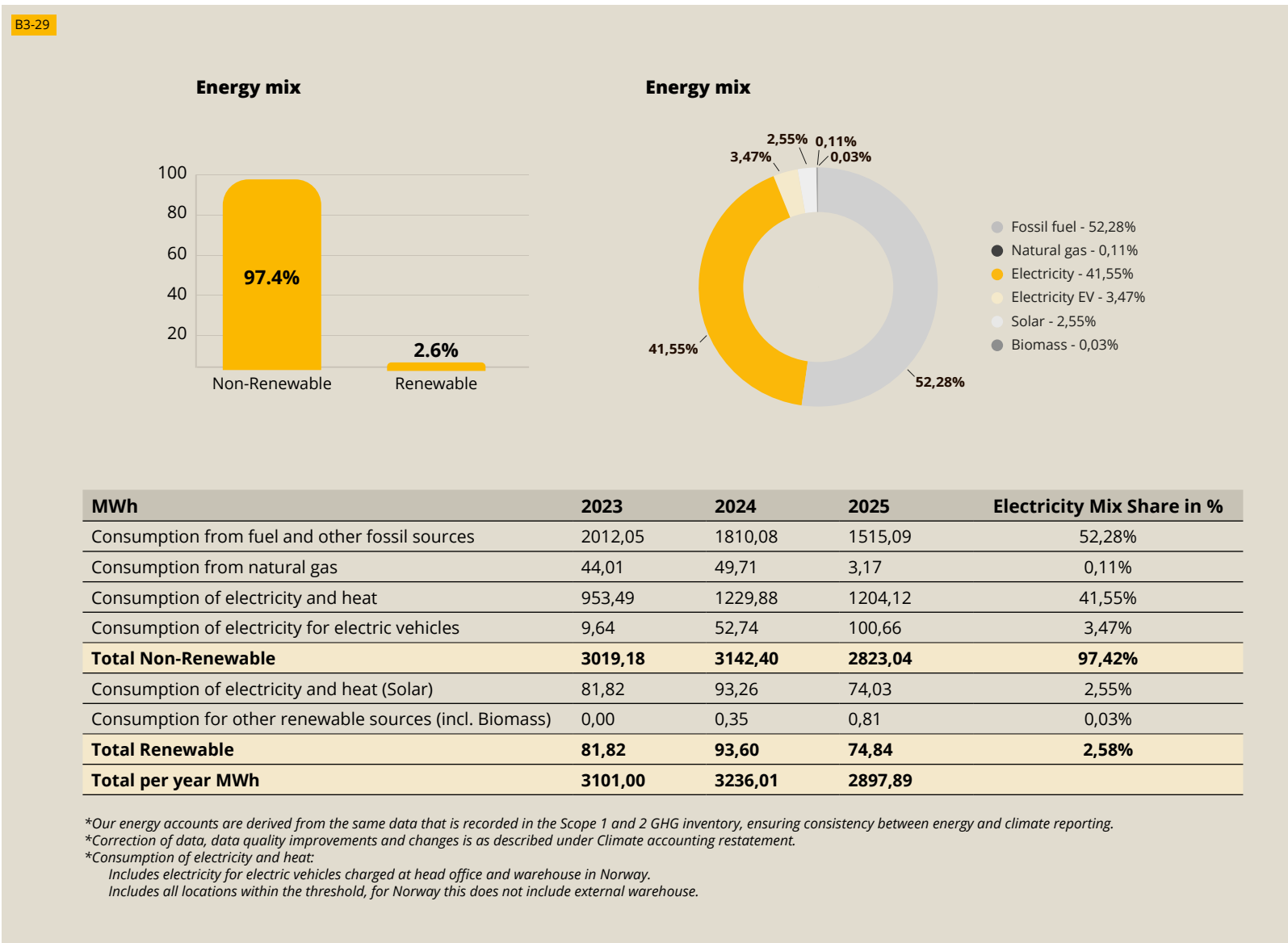
The amount of *non-renewable electricity* used in our operations is purchased, while the *renewable electricity* is generated and consumed at our locations owned or leased by Hallgruppen. Hallgruppen has for the reporting year no renewable electricity purchased.

Fuel and natural gas

The amount of fuel consumed in MWh is calculated based on the actual fuels used in the reporting year. Yearly used fuels are multiplied by the emission factors communicated by Eurostat.

Biomass

The amount of biobased fuel consumed in MWh is calculated based on the actual biobased fuel used in the reporting year. Yearly used biobased fuels are multiplied by the emission factors communicated by the Norwegian Environment Agency (Miljødirektoratet) as this is only used in operations in Norway & Sweden.



About Hallgruppen’s climate accounting

Our products generally have a lower climate impact than permanent buildings, due to less material input. Hallgruppen’s greenhouse gas emissions mainly stem from purchased material, transport and other operational activities.

Supplier selection and environmental monitoring across the value chain will be essential to strengthening our position as a responsible market participant.

Compared to permanent buildings, our solutions deliver a lower climate impact through reduced material input.

B3-50

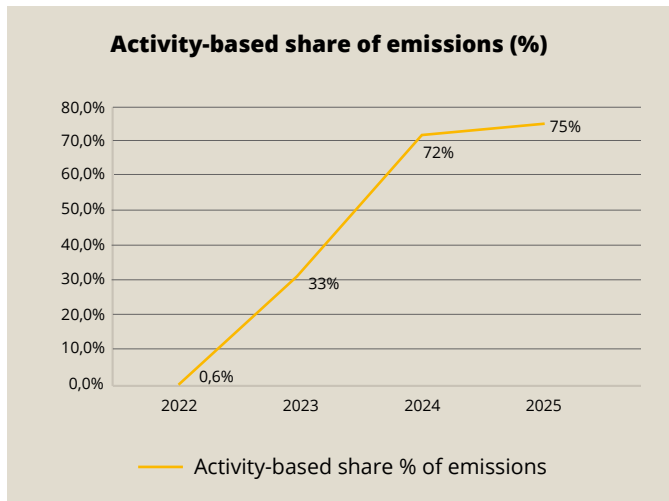
Hallgruppen’s climate accounting provides an overview of greenhouse gas emissions from both own operations and the value chain. The accounting is prepared in accordance with the Greenhouse Gas Protocol (GHG), using an operational control approach, and covers:

- ✓ **Scope 1 (Direct emissions)**
- ✓ **Scope 2 (Energy-related indirect emissions)**
- ✓ **Scope 3 (Other indirect emissions)**

We primarily rely on spend-based methodologies to determine emission categories and classifications. In recent years, we have increasingly prioritized activity-based data, as the majority of our emissions are associated with key materials and transportation.

In 2025 Activity-based data accounted for 75% of total emissions, compared to 72% in baseline year 2024, and 0,66% in 2022.

2024 was established as the Group’s baseline year with 72% activity-based data.



Gross scopes 1, 2, 3 and total GHG emissions

Category	2023	(Baseline) 2024	2025	Share	Change in % 2024 vs 2025	Reduction since Baseline	Target 2030	Target 2025
Scope 1 GHG emissions B3-30								
Fuel combustion	511,98	460,65	376,11	0,8%	-18,4%			
Scope 2 GHG emissions B3-30						-14,50%	-20%	Net-zero
Electricity consumption (location-based)	43,91	76,93	83,76	0,2%	8,9%			
Electricity consumption (market-based)	455,89	605,45	613,95		1,4%			
Scope 3 GHG emissions B3-51 B3-52								
1. Purchased goods and services	40999,70	53958,78	45430,76	91,9%	-15,8%			
2. Capital goods	15,78	8,49	7,62	0,02%	-10,2%			
3. Fuel and energy related activities	-	-	-	-				
4. Upstream transportation and distribution	1733,37	3245,22	3414,05	6,9%	5,2%			
5. Waste generated in operations	19,64	19,75	21,83	0,04%	10,6%			
6. Business travel	109,96	162,92	123,21	0,2%	-24,4%			
7. Employee commuting	-	-	-	-				
8. Upstream leased assets	-	-	-	-				
9. Downstream transportation and distribution	-	-	-	-				
10. Processing of sold products	-	-	-	-				
11. Use of sold products	-	-	-	-				
12. End of life treatment of sold products	-	-	-	-				
13. Downstream leased assets	-	-	-	-				
14. Franchises	-	-	-	-				
15. Investments	-	-	-	-				
Total Scope 3 emissions pr. year [tCO2e]	42878,46	57395,16	48997,48	99%	-14,6%			
Total emissions pr year [tCO2e] (location-based)	43434,34	57932,74	49457,35		-14,6%			
Total emissions pr year [tCO2e] (market-based)	43846,32	58461,26	49987,54		-14,5%			

*Threshold: Subsidiaries with under five employees have been excluded for the purpose of collecting activity-based data in scope 1 and 2.

*The report considers the following greenhouse gases, all converted into CO2 equivalents: CO2, CH4, N2O, SF6, NF3, HFCs and PFCs.

Restatement

We recalculate our data when changes occur. Triggers for recalculation include structural changes, updates to calculation methods, improved accuracy of emission factors or activity data, and discovery of errors. We have restated the 2023 and 2024 figures due to improvements in data quality and extraction processes.

Scope 2

For scope 2, both 2023 and 2024 data on electricity and heat have been updated, this resulted in an increase of 18,57 tCO2e in 2023 (+29,7 %) and increase of 17,2 tCO2e in 2024 (+17,2 %).

Scope 3

For scope 3, both 2023 and 2024 have improved data quality, 2023 this resulted in a decrease of -243,85 tCO2e (-0,6 %) and increase of 1233,20 tCO2e in 2024 (+2,1 %).

Scope 1

Scope 1 emissions represent less than 0,8% of the Group's total emissions. It comes from the use of natural gas in operations and fuels for equipment and cars, however 99,7% of scope 1 emissions in 2025 came from use of cars which is decreasing due to the transition to electrical vehicles. Use of natural gas at our production facility also decreased due to the lack of need for additional heating. Result is a decrease in emissions by 18,4% compared to 2024.

Scope 2

Scope 2 emissions account for less than 0.2% of total emissions. Emissions from electricity consumption increased in 2025, by 8,9%.

The increase was due to several matters, increased transition to electrical vehicles in Denmark and some higher electricity use in Latvia, however also because of the changes in number of locations such as the original expansions in the UK and Northern Ireland that was later halted. Changes in the number of locations during 2025 have affected electricity consumption going forward.

Electricity consumption at major sites is based on actual kWh data, while estimates are used for smaller locations. Consumption from charging electrical vehicles is actual kWh data from charging stations.

Renewable electricity generated and used from on-site solar installations in Denmark and Sweden is excluded from Scope 2 but are included as part of our energy account. The Group does not currently use guarantees of origin, and further initiatives to reduce emissions through energy efficiency measures, across several sites, will require further attention.

Scope 3

Scope 3 emissions in 2025 represents 99% of the Group's total emissions. These emissions originate from purchased goods and services, capital goods, transport, waste generated in operations, and business travel. While this is outside Hallgruppen's direct operational control, we seek to influence them through procurement practices, supplier requirements and product choices. Categories with no classified purchasing data are considered immaterial.

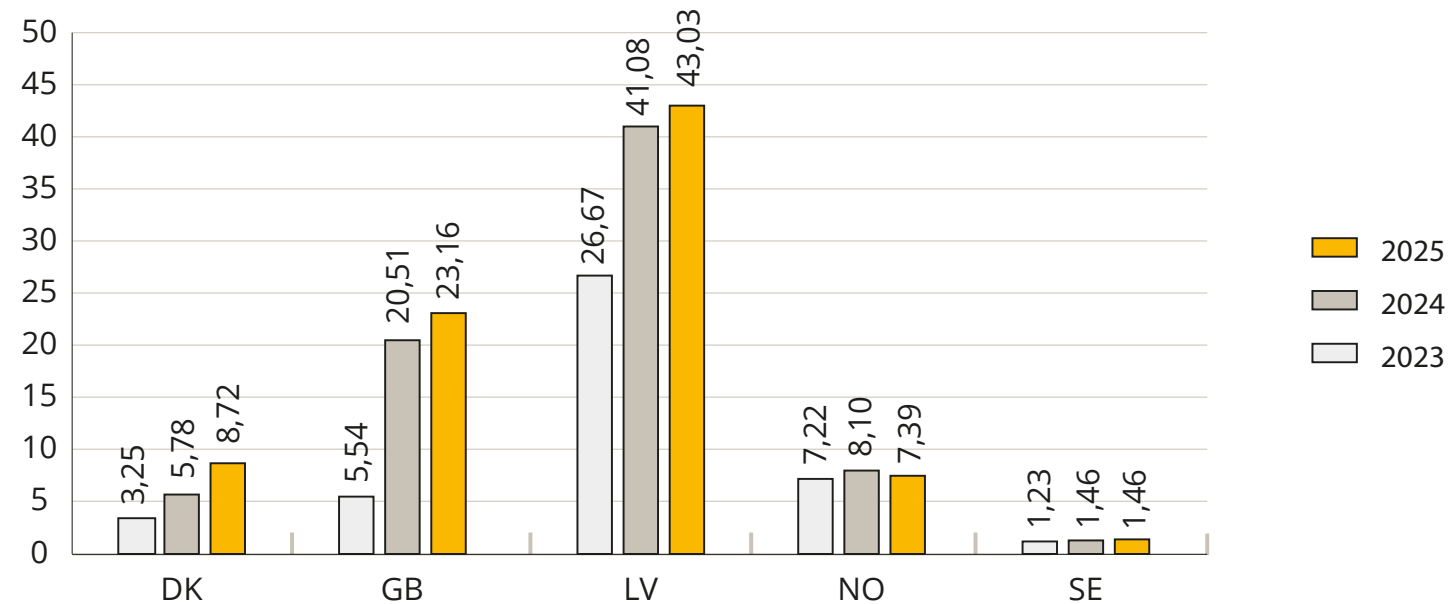
Emissions are primarily estimated using a spend-based approach, where we classify purchasing data into relevant emissions factor categories and GHG Scope 3 categories. Where available, activity-based data is used to improve accuracy, including data from major transport and waste suppliers, EPDs for emissions of key materials, purchased volumes for steel and aluminum, and business travel records.

Purchased goods and services is the largest source, accounting for 91,9% of total emissions, primarily from materials such as steel and aluminum. The decrease in purchased goods and services from 94,14 % in 2024, is mainly due to a decrease in our construction business but also caused by a small decrease in our aluminum purchase which has a large effect on Scope 3 emissions and our total emissions in 2025.

Further, upstream transport accounted for 6,9%, while the remaining categories are all below 0,2%.

Going forward, Hallgruppen will continue to enhance its Scope 3 reporting and further integrate environmental criteria into supplier selection and evaluation processes, supporting a gradual reduction of emissions across the value chain over time.

Emissions from energy usage tCO2e (location-based) B3-53





Carbon intensity

The reduction in carbon intensity in 2025 is primarily driven by lower turnover, largely due to a temporary decline in the market for our conventional construction department, which is also more carbon intensive.

This development is further supported by stable activity within our temporary structure business, which is inherently less carbon intensive. Carbon intensity is, however, expected to increase in line with a rebound in activity within the conventional construction segment.

B3-31

Emissions per turnover (tCO ₂ e / mill. NOK) (location-based)	2023	2024	2025
Carbon intensity Scope 1 and 2	0,38	0,44	0,38
Carbon intensity Scope 1, 2 and 3	29,72	47,31	40,71

*Carbon intensity is calculated for tCO₂e from a location-based approach.

*Carbon intensity value is presented in tCO₂e/million NOK.

*Turnover for 2025 is based on a preliminary estimate, as final turnover was not available when calculation was made.

*Adjustments for last year's turnover will be presented in next year's report.

Restatement

Based on the restatement under greenhouse gas emissions. We have restated the 2023 and 2024 figures for carbon intensity.

Carbon intensity Scope 1 and 2

For scope 1 & 2, this resulted in a decrease of 0,02 tCO₂e/mill. NOK in 2023 and increase of 0,04 tCO₂e/mill. NOK in 2024.

Carbon intensity Scope 1, 2 and 3

For total carbon intensity, this resulted in a decrease of 0,12 tCO₂e/mill. NOK in 2023 and increase of 0,71 tCO₂e/mill. NOK in 2024.

Circularity, resource use and waste

The construction sector is the largest source of waste in Norway, and in Europe, construction and demolition waste represents one of the largest waste streams by volume.

Actions - Circular principles

B7-37

Circular Design and Reuse

Our structures are designed with circularity in mind. They are delivered as modular kits, minimizing on-site waste.

Steel and aluminum components are durable and long-lasting, while the coated fabric is resilient, easy to repair, and adaptable, allowing the structures to be dismantled, relocated, and reused. In the last year there has been additional attention paid to reducing waste from add-on materials.

Other circular design features

The structures design also allows for modular replacement of individual sections or components. In case of more significant damage, only the affected section of the fabric needs replacement, extending the overall lifespan of the structure and minimizing material waste.

Some of our ready-to-deploy structures come with repair kits for minor maintenance, reducing the need to replace the entire fabric.

In some cases, a completely new cover can be made for an existing structure, thereby extending the structure's lifespan.

We design structures that can be dismantled, adapted, and reused over time, helping reduce waste and extend material lifespan.





Supplier Management and controls

Environmental Product Documentation

We require Environmental Product Documentation (EPDs) for all our main components, in terms of circularity and resource use, it outlines a product's environmental impact across its entire life cycle. EPD promotes transparency, responsible material choices, circularity, and strengthens both the products and the company's environmental profile.

Our zinc coated steel construction series demonstrates an average recycled content of approximately 85 %, based on 49.2 % recycled content in hot-rolled steel and 100 % in cold-rolled steel. Steel has a documented life span of 100 years.

We use Nordic insulation in our ISO covers. To minimize climate impact, Hallgruppen uses low-compressive-strength glass wool made from 73% recycled glass. Surplus material is reused in production, and the product is documented with an EPD.

Supplier Code of Conduct

We set environmental expectations in our Supplier Code of Conduct, to ensure minimizing waste and sustainable practices. These requirements include:

- **Hazardous Materials Management:** Suppliers must identify and manage hazardous materials to ensure their safe handling throughout production, storage, recycling, reuse, and disposal.
- **Handling of Waste, Resources Disposal and Recycling:** Suppliers should promote sustainable resource management by minimizing waste and emissions through responsible disposal, recycling, material substitution, and circular practices.

As part of an overall supply chain audit process, we conducted controls at 5 key suppliers in 2025, which included the points above to confirm compliance.

Enhanced Waste Reporting

In 2025, we strengthened our internal waste reporting to improve monitoring and set more precise targets across our downstream construction project types. A key focus has been on tracking waste from project delivery during construction and assembly for our temporary structures in comparison to traditional building projects.

Continuing development of our environmental data and measurements

We are aware that the waste and recycling solutions associated with coated fabric are not optimal at present, but we are closely monitoring the development of technology that enables the recycling of coated fabric.

We will continue to strengthen the focus on waste monitoring and setting targets, as it is key to improving environmental performance and supporting our circular design. By tracking waste more accurately, we can reduce and potentially eliminate waste streams and increase efficiency.

Further, towards 2030 there will be a focus on the Packaging and Packaging Waste Regulation (PPWR), which will support the efforts of reduction, recyclability and reuse related to packaging, while ensuring alignment with circular economy goals.

Waste Management

B7-38

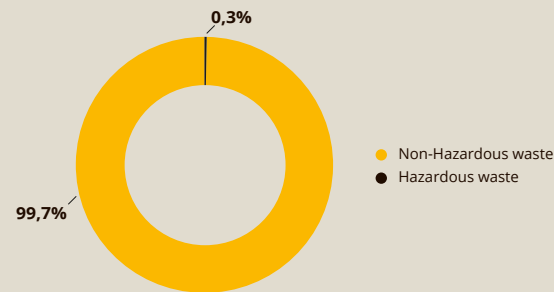
Most of the Group's waste is generated from our warehouse operations, and from our production facilities, followed by downstream project deliveries. The largest waste streams primarily consist of mixed commercial waste, plastic, wood and metals.

Setting up a temporary structure generates considerably less waste than a conventional construction building, as there are minimal on-site built solutions in our projects. This means little waste per square meter of structure built, and therefore, the Group does not have significant costs associated with waste management, compared to the conventional building industry overall.

Our waste data is collected through reports and invoices provided by professional waste management companies responsible for handling waste across the Group's various locations. The data is consolidated and categorized according to the information available.

Further, the reason for the relatively high percentage of waste diverted from disposal is due to the main waste fractions being recyclable or directed to energy recovery. We have very low, to none at all, masses or other disposal fractions traditionally found in conventional building industries.

The Groups waste management show a significant decline in waste volumes from 2024 to 2025 by 20%. Mainly due to the decline in our conventional building department last year.



Waste generated annually	2023	2024	2025	Change %	Share
Hazardous waste	1,27	3,73	1,16	-1%	0,3%
Directed to disposal	1,25	3,73	0,02		
Incineration (without energy recover)	1,25	3,73	-		
Landfilling	-	-	0,02		
Other disposal operations	-	-	-		
Diverted from disposal	0,01	-	1,14		
Prepare for reuse	-	-	-		
Recycling (material recycling)	0,01	-	0,36		
Other recovery operations (energy recovery)	-	-	0,79		
Non-Hazardous waste	564,31	543,58	455,11	-19%	99,7%
Directed to disposal	5,90	6,12	24,23		
Incineration (without energy recover)	-	-	0,05		
Landfilling	5,90	6,12	24,18		
Other disposal operations	-	-	-		
Diverted from disposal	558,41	537,46	430,88		
Prepare for reuse	-	-	-		
Recycling (material recycling)	255,59	314,66	241,47		
Other recovery operations (energy recover)	302,82	222,80	189,41		
Total waste generated	565,58	547,30	456,27	-20%	
Total waste diverted from disposal	558,42	537,46	432,03	-24%	
% of waste diverted from disposal	99%	98%	95%		

*The data is subject to potential inaccuracies, given that the data has been manually consolidated, categorized, and analyzed. The information on disposal operations has only been further developed in recent years, also it being based primarily on data from waste suppliers in Norway and Sweden.

Restatement

We have restated the 2023 and 2024 figures due to improvements in data quality from our waste suppliers in 2025, giving us new information about how our waste is processed. For 2023 and 2024 waste generated is moved from category Non-hazardous directed to disposal - Incineration (without energy recovery), to Non-hazardous diverted to disposal - other recovery operations (energy recovery).

Waste Targets

Hallgruppen tracks our waste disposal across all companies within the Group as part of our management system. In Norway we also track this separately between warehousing, downstream projects deliveries for traditional buildings and temporary structures.

The Group's sorting rate is handled and sorted by fraction on the construction site before collection and are then controlled by the designated waste disposal companies. This is measured separately from the VSME and GRI requirements.

We use KPIs such as **waste fraction sorting rate** to track waste fractions, but we also track **annual waste amount** and **kg waste per square meter-built area** for temporary structure projects deliveries.

For internal monitoring, we use more refined targets within our temporary structure project depending on the type and size of the individual project.

Waste fraction sorting rate target 2025:

Hallgruppen Group: 80%

Our temporary structures generate limited on-site waste, supporting a more resource-efficient alternative to conventional construction methods.



Waste fraction sorting rate:

The Group's sorting rate is handled and sorted by fraction on the construction site before collection and are then controlled by the designated waste disposal companies.

The Group's average waste fraction sorting rate has improved by 5% in 2025.

Our various operational areas exhibit significantly different waste fraction sorting rates. Warehouse operations and temporary structure projects achieve the highest % rates, while traditional building projects demonstrate comparatively lower performance. This is due to Warehouse operations and temporary Structure Projects having lower Residual waste.

Kilo per m2:

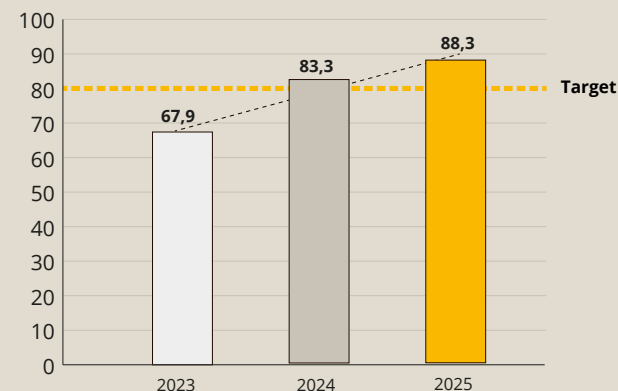
According to the numbers from Statistics Norway (SSB), kg/m² based on reports from permit-required conventional construction projects in Norway for new build projects kg/m² can vary between 38,8 - 56,6 kg/m². In comparison temporary structure construction projects have significant lower waste per kg/m², in addition to higher sorting rate.

New build projects	kg/m ²
Temporary Structure Projects*	4,0
Conventional Construction Project	38,8-56,6

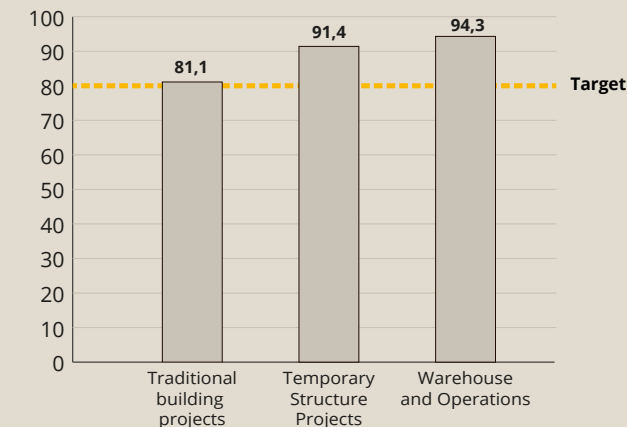
*The number is average based on 2 internal reference projects for new buildings in 2025.

*Statistics Norway (SSB), kg/m² based on final reports from permit-required conventional construction projects for new build projects kg/m² can vary between 38,8 - 56,6 kg/m².

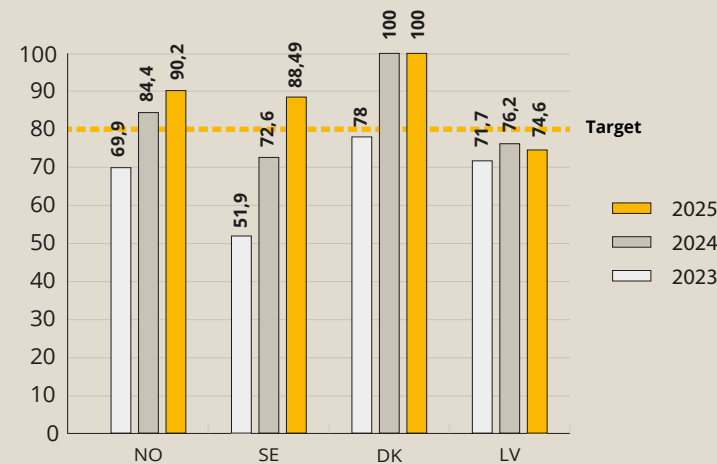
The Group's average sorting rate %



Sorting rate % (Norway)



Waste sorting rate % per country



Social

Social aspects of sustainability are central to Hallgruppen, both in our own operations and our value chain and will continue to be an important focus moving forward.

Good working conditions, along with good health and safety practices, are essential for maintaining stability, low sick leave and a safe workplace, as our employees are an important resource for Hallgruppen. Our industry is traditionally male dominated, which means that diversity, equality and inclusion remain issues that require attention.

Impact, risk, and opportunity

Own operations

- Well-regulated working conditions support employee health, low sick leave and internal flexibility.
- Areas of our business activities in own operations involve high workloads, unfavorable working hours and risky work operations.
- Potential injuries, accidents, or negligence on sites can increase costs and harm the reputation.

Value Chain

- Risk of negative impact in supply chain on working conditions and human rights.
- Opportunity to make a positive impact, through close collaboration, compliance and social responsibility

Our people are central to our business, and we work to ensure safe workplaces, good working conditions, and responsible practices across our value chain.



Own workforce

Policies

Hallgruppen's Human rights **policies** and processes related to own workforce:

- **Hallgruppen Code of Conduct** (updated 2025)
- **Whistleblowing policy** (complaints-handling mechanism)
- **Hallgruppen AS Gender Equality Statement 2024** (Only Norway)
- Employee handbook
- HSE and work environment policy

They are communicated through our company's management system, group-wide intranet, and available on our website, such as whistleblowing. The policies mentioned above sets a common standard for responsible behavior and human rights within the Group and is rooted in the company's values and approved by our CEO.

All Hallgruppen employees are entitled to safe and well-regulated working conditions, including secure employment, fair treatment, appropriate compensation for working hours, and the freedom to organize.

Group HSE Manager handles health and safety, while Group HR Manager oversees employment conditions, benefits, ethical standards, freedom of association, collective agreements, training and issues like discrimination, equality, and inclusion.

C6-61

Hallgruppen Code of Conduct covers the following topics:

- **Child labour**
- **Forced labour**
- **Human trafficking**
- **Discrimination**
- **Accident prevention (HSE)**
- **Other:**
 - Ethical conduct and compliance with the law
 - Fair business conduct and fair competition
 - Anti-corruption and anti-money laundering, bribery, gifts and hospitality
 - Sanctions and trade controls
 - Quality, professionalism, and counterfeit parts
 - Financial responsibility
 - Transparency and communication
 - Confidential information and privacy
 - Conflict of interest
 - Sustainability, responsibility and environmental impact
 - Freedom of association
 - Wages, working hours and other employment conditions
 - Violence, threats and harassment
 - Substance abuse and alcohol
 - Whistleblowing

Based on the above, none of the above-mentioned topics are considered of risk in own workforce.

Hallgruppen has an open Scandinavian culture with a low barrier for dialogue and whistleblowing. New employees receive mandatory online training on various topics such as ethical guidelines, human rights and whistleblowing. Hallgruppen's **complaint-handling mechanism for its own workforce** is both a standalone whistleblowing policy, but also a part of Code of Conduct and Employee handbook. Our whistleblowing procedure is communicated through both the intranet and our external website.

The company is committed to uncovering misconduct and ensuring safe, confidential reporting without fear of retaliation. All employees, customers, suppliers and partners associated with Hallgruppen can report any such concerns if they become aware of them and can report the issue securely and confidentially if they wish to.

In certain cases, employees also have a duty to report, such as when witnessing harassment, discrimination, or risk of life and health.

Concerns may include, but are not limited to:

- Human rights and labour issues, such as diversity, discrimination, harassment.
- Unacceptable working conditions.
- Health and safety violations.
- Corruption or other financial crimes.
- Environmental or climate-related hazards.
- Abuse of authority.
- Breaches of data protection or privacy.

There were 0 cases of Whistleblowing in 2025.

C7-62

There were **no severe negative human rights incidents in own workforce or in value chain** in 2025 related to any of the following topics:

- **Child labour**
- **Forced labour**
- **Human trafficking**
- **Discrimination**
- **Other**

For more information on value chain incidents please see "workers in value chain".

Actions and targets - own workforce

General workforce information

Diversity, equality and inclusion are integrated into our HR management policies, and we have zero tolerance for discrimination. Hallgruppen has had a stable balance between women and men in the Group since 2024, maintaining 18% *ratio of women* in 2025, but increased 6% since 2022.

Hallgruppen is committed to working systematically at multiple levels to foster diversity, equality and inclusion and being an attractive employer, with an ambition of increasing *ratio of women* employed to 30% by 2030.

We aim to achieve this by ensuring fair conditions, the company conducts salary mapping across job categories, supporting transparency and equal pay practices.

Further promoting work-life balance, through recognizing its importance in supporting and attracting a diverse workforce. This is embedded through clear communication via our policies, guidelines, the employee handbook, and integrated into our online training programs.

In terms of safe and respectful working environment. Employees are encouraged - and obligated - to report any instances of harassment or discrimination, and all employees receive whistleblowing training on how and when to report concerns.

Through these initiatives, Hallgruppen aims to strengthen its inclusive culture and support its target of increasing gender diversity within the workforce.

B8-39

Country	Number of employees	Permanent contract	Temporary contract	Women	Men	Ratio of employees women (%)	Ratio of employees men (%)
Norway	86	83	3	14	72	16,3%	83,7%
Sweden	24	24	0	6	18	25%	75%
Denmark	25	24	1	4	21	16%	84%
Latvia	32	32	0	6	26	18,8%	81,3%
Finland	2	2	0	1	1	50%	50%
United Kingdom	2	2	0	0	2	0%	100%
Northern-Ireland	2	2	0	0	2	0%	100%
Poland	1	1	0	1	0	100%	0%
Total	174	170	4	32	142	18,4%	81,6%

*Employee counting methodology: head-count.
*other category is not applicable.

B8-40

Employee turnover refers to employees who leave the undertaking voluntarily or due to dismissal, retirement or due to other reasons.

In 2025 the Groups employee turnover rate was at 23,4%, largely influenced by downsizing in UK and Northern-Ireland and the challenging construction market, which also led to layoffs. Some turnover is related to compatibility and performance, which we address through enhanced recruitment, onboarding, and employee support. With only a small number leaving voluntarily, indicating that most employees want to stay.

Adjusting for this factor the employee turnover is about 14,8%. We consider our well-structured onboarding process of new employees to be one of the reasons for fewer employees leaving voluntarily.

Country	Turnover
Norway	17%
Other Country Subsidiary	n/a
Total	23,4%

*The number is only represented for Norway and the Group as a total, because no subsidiary has 50 or more employees.
*The number is from our HR-system.

The work has up until recent years been largely policy-driven, and we are only now beginning to establish a more structured approach to follow-up.

It is also relevant to note that the implementation of a new HR system in 2026 will provide a significantly improved data foundation going forward. The system will further support increased leadership involvement throughout the employee lifecycle and enhance managers' awareness and use of data.

Remuneration, collective bargaining and training

B10-42

Hallgruppen follows applicable laws and regulations related to national minimum wage or through a collective bargaining agreement. In our subsidiaries in Sweden and Denmark, there are collective agreements, and annual salary adjustments in these countries are made in line with the collective agreements. It is estimated that 20% of the Groups employees are covered by such agreements.

Country	Pay that is equal or above applicable minimum wage	Percentage of employees covered by collective bargaining agreements
Norway	✓	0%
Sweden	✓	100%
Denmark	✓	40%
Latvia	✓	0%
Finland	✓	0%
United Kingdom	✓	0%
Northern-Ireland	✓	0%
Poland	✓	0%
Total	✓	20%

*Total percentage number for Collective bargaining agreements is calculated based on coverage in the Group.

Average number of **annual training hours per employee**, broken down by gender

2025	Total	Men	Women
Average hours pr. user	0,34	0,29	0,54

*This number is calculated from the training hour logged in Hallgruppen Academy for the Group.

The 22 % **pay gap between male and female employees** reflects the Group's workforce composition across all roles, departments and entities, including international subsidiaries. The gap is primarily driven by differences in the distribution of women and men across job categories, seniority levels, functions, and countries, rather than unequal pay for equal work.

This is supported by the **Norwegian activity and obligation reporting (ARP)** statement for Hallgruppen Norway, which identified a pay gap of 9% for the Norwegian company.

Men are overrepresented in management, and several of the higher paid senior specialist and leadership roles under support functions. Seniority and longer average tenure in several of these roles also contribute to the overall gap. Support Functions category includes specialists within engineering, sales, project management, factory management, finance and administration. The Operations workforce category consists mainly of production, assembly, warehouse, and factory roles.

Hallgruppen is committed to promoting equal opportunities through fair remuneration practices, recruitment, and employee development initiatives aimed at improving gender balance over time. The implementation of a new HR system in 2026 is expected to strengthen data quality and support more effective monitoring and management of this area.

Gap in pay between its female and male employees	Percentage pay gap between male and female employees
Total	22%
Management	n/a
Support function	29%
Operation workforce	n/a

*Hallgruppen is in transition between HR systems, which may result in inaccuracies in the reported figures.

C5-59

Our industry is traditionally male dominated, which is evident in the **female-to-male ratio at management team**. Hallgruppen has female management, but no female managers on the management team. Diversity, equality and inclusion remain issues that require attention.

Female-to-male ratio in Management Team	0
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*Calculated as an average ratio of female to male.

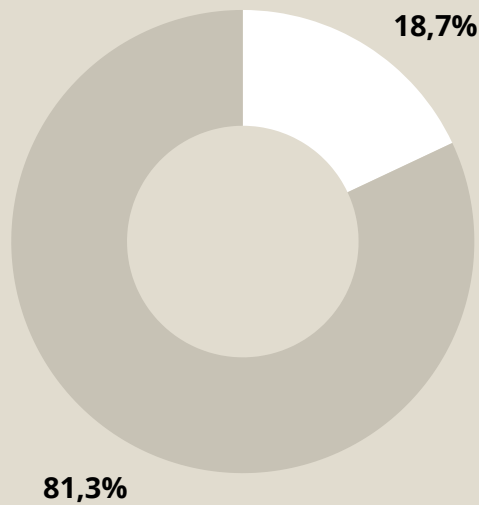
Diversity, equality and inclusion metrics

Since 2024, Hallgruppen has maintained a female representation of 18% across the Group and 33% on the Board of Directors, reflecting an improvement compared to previous years.

The workforce is primarily composed of employees aged 31–50, followed by those over 50 years, while employees under 31 years represent the smallest group. The same trend is observed across the gender distribution for both men and women, with the highest representation in the 31–50 years group and the lowest among employees under 30 years.

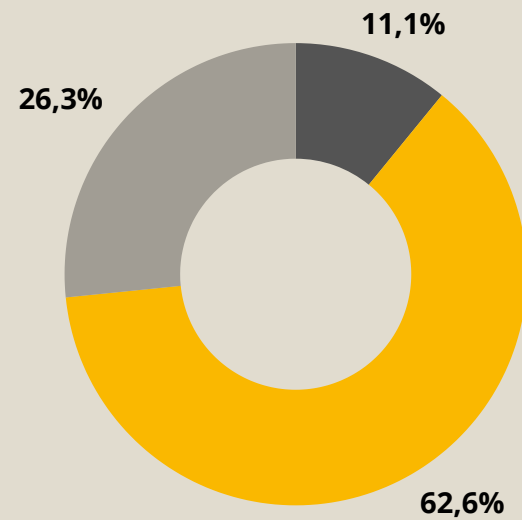
2025
Ratio of employees by gender

● Women ● Men

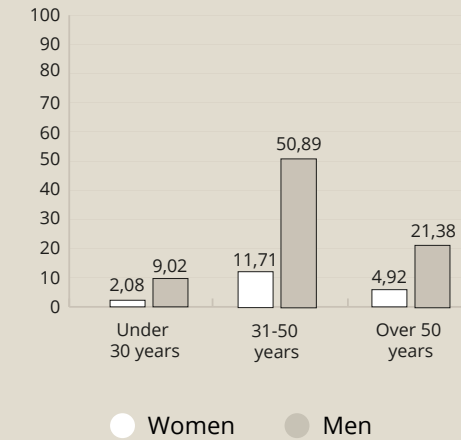


2025
Ratio of employees by age

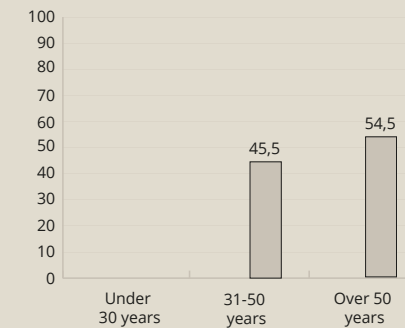
● >30 ● 31-50 ● >50



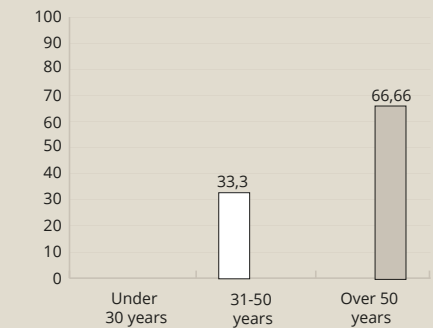
Ratio of employees in % by gender and age



Ratio of management team in % by gender and age



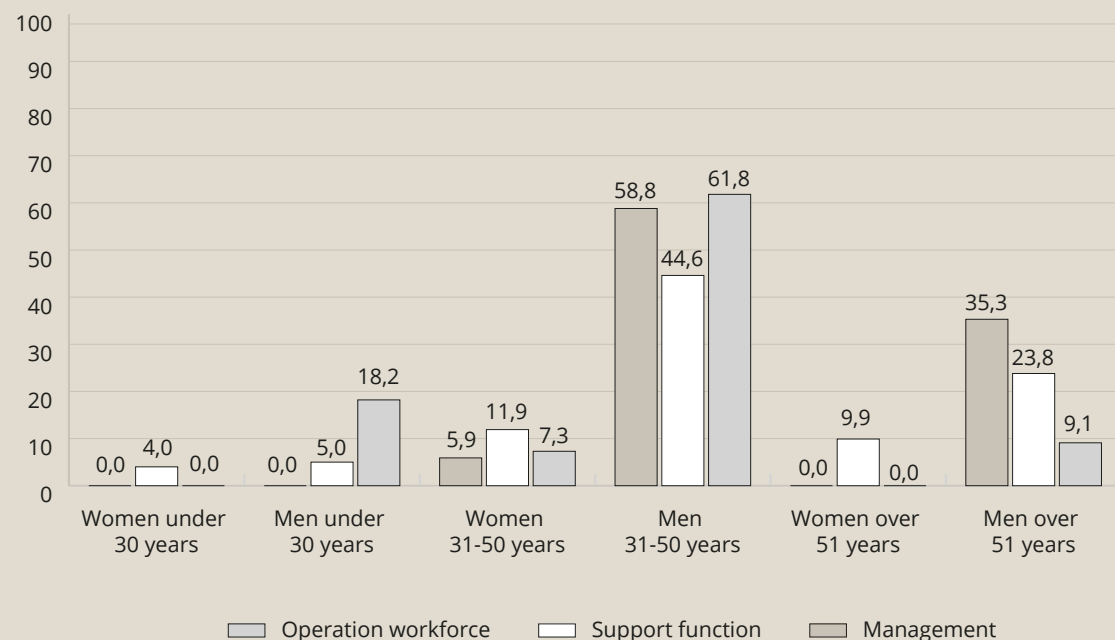
Ratio of the board in % by gender and age



Employee category in each of the following diversity categories

Men have the highest representation in all employee categories compared to women, and the highest in management and Operations workforce. Whilst the highest representation of women is in employee categories Support function. Hallgruppen has only 5,9 % women in management, compared to 94,1% men.

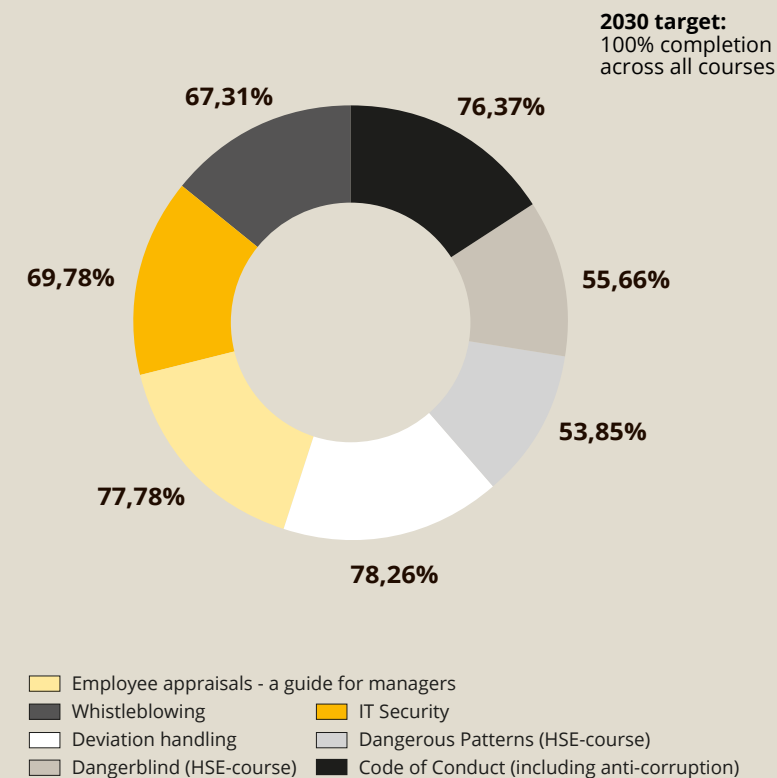
Gender distribution at different job levels/groups and age in %



Training for employees 2025

Hallgruppen has a selection of online courses as part of our Hallgruppen Academy, this includes some optional, but mainly mandatory online training for employees within topics such as HSE, Management, Whistleblowing, ethical business conduct, human rights and anti-corruption.

Completion rate 2025



Workforce - Health and Safety

In accordance with applicable legal requirements such as Norway's Internal Control Regulations, Hallgruppen has established a comprehensive HSE management system, which is continuously improved. The HSE-system follows the principles from ISO 45001, but it is not certified accordingly. The system applies to all 174 employees, temporary staff, and subcontractors working on behalf of the company.

HSE is a top priority, particularly in project deliveries, where the highest risk is associated with on-site construction work, and especially the assembly of heavy structures and work at height. HSE activities are primarily managed through systems and processes in Norway, with local adaptations implemented at international locations.

Risk management and preventive measures

Hallgruppen systematically identifies and assesses occupational health and safety risks across its operations, focusing on factors that may affect physical or mental health and safety, and with annual reviews and risk-reduction action plans developed in collaboration with occupational health services.

Project-specific risk assessments are conducted at project start and form the basis for HSE-plans, with continuous updates throughout execution. Project participants have a duty to provide ongoing feedback and report any new risks or changes, ensuring that the risk assessment is continuously updated and serves as

a basis for informed decision-making during both planning and execution of the project.

Before starting up, the installation team systematically reviews local hazards on and around the assembly area to ensure appropriate measures are in place. Assemblers are required to have the necessary competence, understanding of task-specific risks, and must familiarize themselves with project-specific conditions that may affect safety or the working environment.

Our primary approach is to eliminate risks by changing methods or introducing preventive measures. When this is not possible, physical barriers and other controls are implemented to reduce the likelihood of incidents and minimize their impact on personnel and equipment. High-risk activities, such as lifting and assembling steel or aluminum structures and working at heights, receive heightened attention, with Safe Job Analyses conducted as needed.

All incidents are reported and investigated through a deviation management system to identify root causes and implement corrective actions. Emergency and crisis response procedures are in place to manage serious incidents or incidents that cannot be handled on the construction site. In such cases, Group management is engaged to provide support and ensure the situation is handled appropriately. High-severity incidents are subject to formal investigation to identify root causes and implement corrective actions to prevent recurrence. We have policies in place to protect workers against reprisals.



Occupational health service, worker participation and safety representative

Hallgruppen collaborates closely with an approved external occupational health service, which supports preventive and systematic HSE work and promotes employee health. The service provides expertise in risk assessments, follow-ups, training, and other HSE tasks, ensuring high-quality health services and easy access for employees.

Employees also have health and treatment insurance, similar arrangements locally or through collective agreements where this applies. This facilitates quick medical assistance and faster return to work.

Employee health and safety participation and the work environment in the workplace is ensured via employee elected safety representatives, In Norway we have three safety representatives, each responsible for their own dedicated area. At local level there are employee representatives, either regulated by collective agreements, regulations or laws, where required.

In addition, we have a formal Working Environment Committee (AMU), that holds at least four meetings a year, attended by Head of HSEQ and Sustainability, HSE manager, HR manager and safety representatives, as well as a representative from the company's occupational health service.

In larger, long-term projects, biweekly project-specific safety rounds are conducted with all project participants to identify and manage workplace risks.

HSE Training and Development

Training and development are key to HSE work, enabling proactive health and safety efforts. Hallgruppen offers a wide range of HSE courses, where some are mandatory for all employees and others optional.

All Norwegian safety representatives are obliged to complete a 40-hour HSE-course. Our assemblers are required to take slinger-course and personnel lift courses. Some assemblers are also certified to operate lifts, forklifts, telehandlers and perform hot works.

Employees receive regular training in basic first aid and defibrillator use, so they are prepared for accidents that can happen both at and outside work. First Aid training is held by our occupational health service provider.

Two mandatory web-based courses on HSE awareness in construction are required. These are developed jointly by the Norwegian construction industry through "Samarbeid for Sikkerhet" (SfS BA), and focus on high-risk tasks and situations, aiming to improve risk awareness and reduce serious incidents.

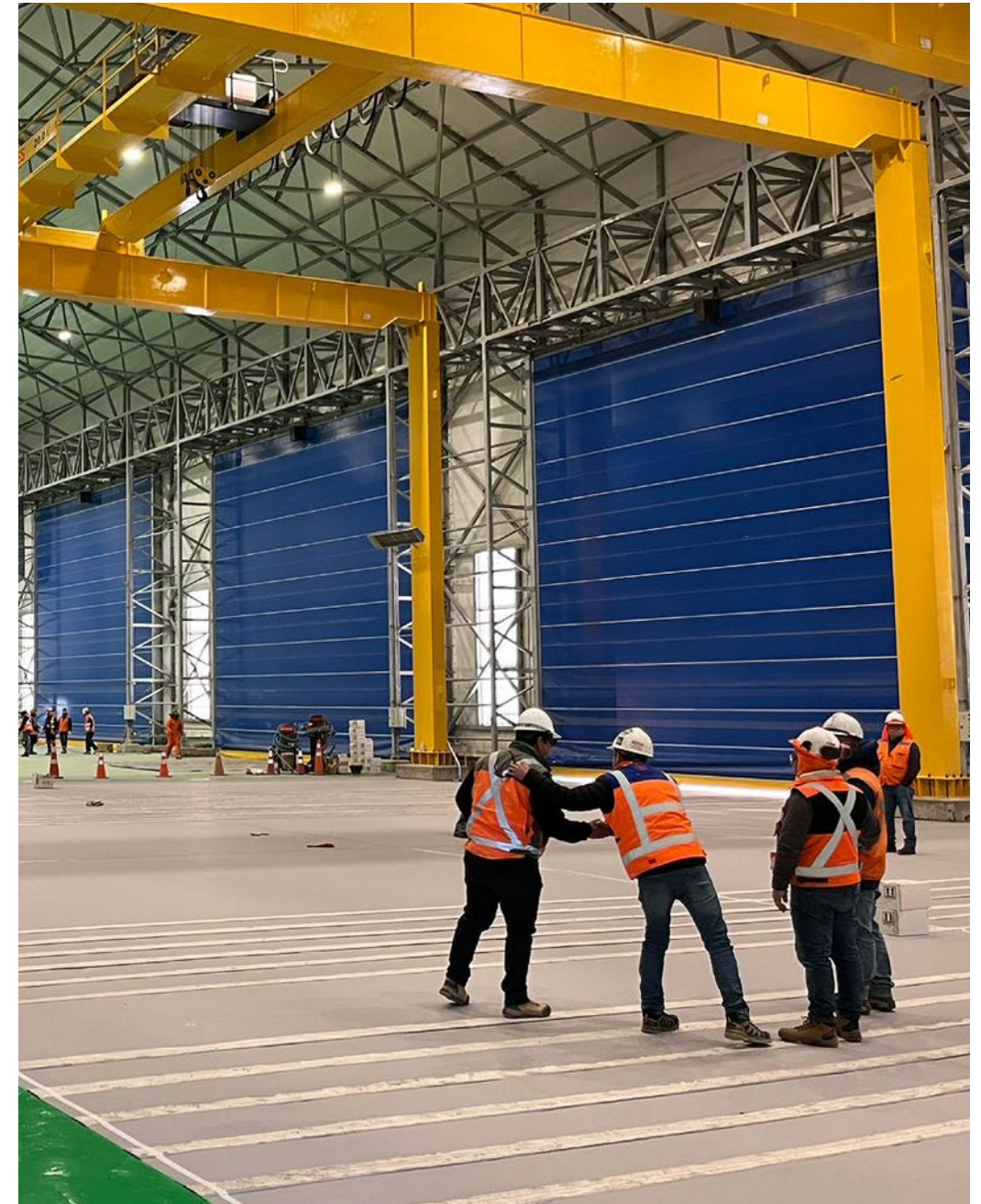
All Hallgruppen assemblers and other relevant civil engineering personnel must complete and pass these courses, however this course is also available to other employees.

HSE impacts on third parties

Sometimes we work with private companies following our own HSE guidelines, and other times with large clients who have their own high HSE standards. These projects provide learning opportunities to continuously improve our processes.

Our impact on nearby operators and the public varies with project complexity and location, so our risk assessment template considers neighbors and others affected by our operations.

Many major clients use software to track HSE practices, environmental impact, and project compliance, helping us follow guidelines and prevent labour market crime.



Health and safety metrics

We continuously work to improve work-related injury and health indicators. Most high-HSE-risk roles are in Norway, while most subsidiaries consist of sales activities.

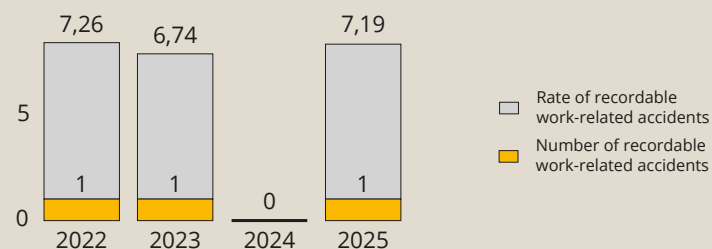
The data presented under Health and safety metrics cover Hallgruppen AS in Norway, representing 86 of the Group's 174 employees in 2025, as consolidating data across countries remain a challenge, this remains a priority and an additional HSE-resource was hired in 2026.

Work-related accidents B9-41

Hallgruppen tracks number and rate of work-related accidents. Over time, Hallgruppen has had a low number and rate of recordable work-related accidents. Only one injury was recorded in the reporting year, reflecting effective preventive measures and a strong HSE culture.

All incidents affecting safety, health, or the work environment are reported in our internal HSE system, with corrective measures documented and followed up systematically. Most incidents are minor, however there could be more serious injuries during assembly of support structures.

There are no fatalities as a result of work-related injuries or work-related ill health in 2025.



*Number of recordable work-related accidents = Number of LTIFR-injuries.
 *Rate of recordable work-related accidents = Lost Time Injury Frequency Rate (LTIFR).
 *Rates have been calculated based on 1,000,000 hours worked.
 *Metrics cover only Hallgruppen AS in Norway.

Number of days lost

Due to only one recordable work-related accident, the number of days lost to work related injuries, high-consequence work-related injuries, fatalities and ill health is only 3 days.

Year	Numbers of days lost to work-related injuries, high-consequence work-related injuries, fatalities and ill health
2025	3

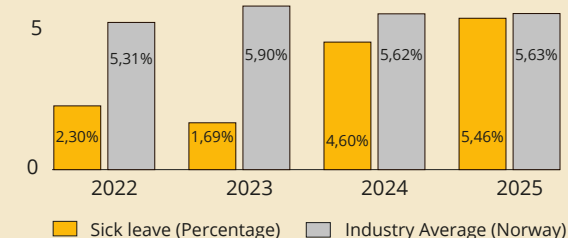
*Metrics cover only Hallgruppen AS in Norway.

Work-related ill health

Hallgruppen systematically tracks Work-related ill health (sick leave) as a key indicator of employee health and the working environment. We measure both short-term and long-term sick leave, which together make up the company's total sick leave. As there are often different causes for these categories, this enables us to implement more targeted measures that address the various underlying factors contributing to sick leave. The total sick leave increased from 2024 to 2025, mainly due to long-term absences from non-work-related causes, including physical illness and some mental health issues.

Despite this, the company's sick leave rate of 5,46 % remains below the industry average, that is 5,63%.

Measures are in place to minimize absences and provide flexible sick leave arrangements.



*Metrics cover only Hallgruppen AS in Norway.
 *The industry average is measured by the Norwegian Contractors' Association (EBA).

Workers in value chain

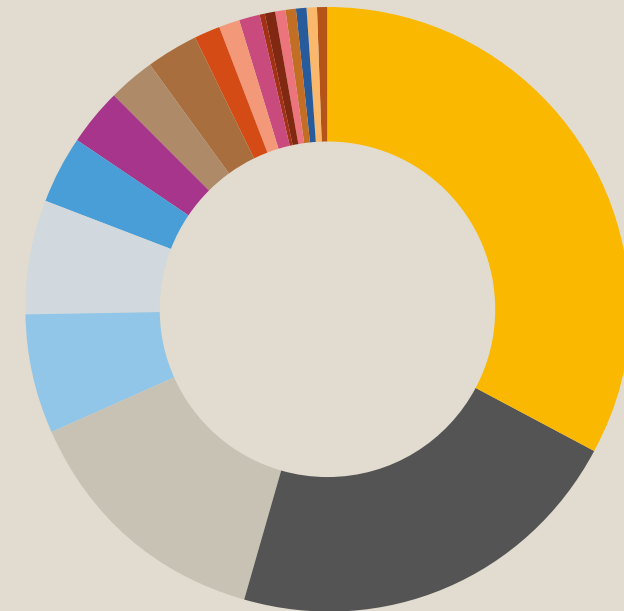
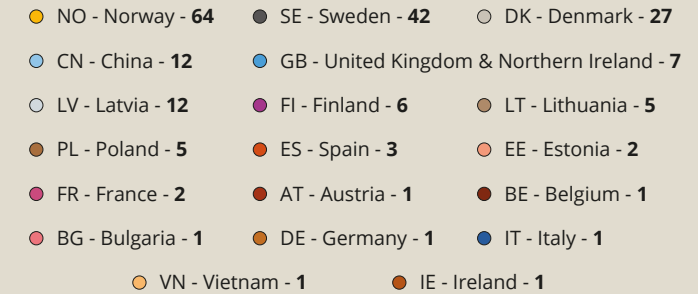
Working conditions across the value chain are a key priority, both upstream and downstream, as they directly impact on our ethical responsibility to uphold human rights and decent work.

They are also closely linked to regulatory compliance, including the Transparency Act, as well as to our long-term business sustainability, and the trust and accountability we build with our customers.

Responsible working conditions throughout the value chain are fundamental to upholding human rights, ensuring compliance, and building long-term trust.



Suppliers by country of origin



Due diligence in Hallgruppen

Policies and communication

Hallgruppen AS follows the OECD Due Diligence Guidelines and is committed to the UN Global Compact's 10 principles in the areas of human rights, labour, environment and anti-corruption. As part of our due diligence, we update our policies, risk assessments, findings and necessary measures as required.

Several **policies and procedures** are in place to promote responsible supply chain and practices across the Group:

- ✓ **Hallgruppen Code of Conduct (updated 2025)**
- ✓ **Supplier Code of Conduct (updated 2026)**
- ✓ **Whistleblowing**
- ✓ **Supplier onboarding procedure**
- ✓ **Supplier audit procedure**
- ✓ **Audit checklist**

Transparency act (in Norwegian)

The Hallgruppen Code of Conduct applies to all employees and subsidiaries, and are included in the employee onboarding and online training, and is regularly updated.

The Supplier Code of Conduct defines our expectations regarding responsibility and is a key tool in our dialogue with stakeholders such as suppliers on sustainability and responsibility in the value chain. This further underline a shared commitment to sustainable practices, ethical business conduct and adherence to applicable laws, regulations, and legal requirements.

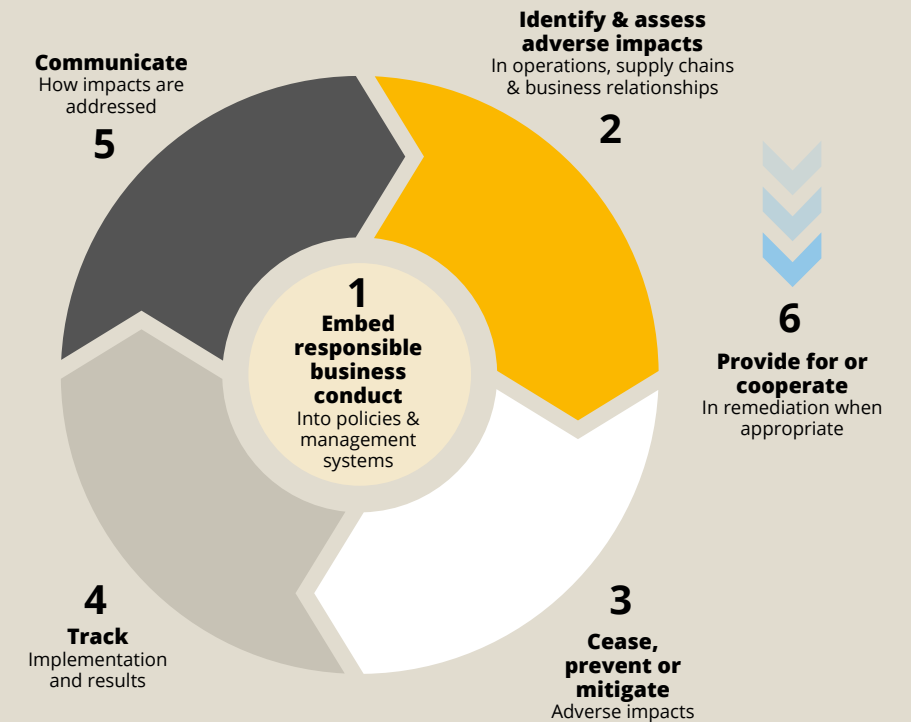
The Sustainability Manager leads, develops, implements and monitors outcome of initiatives of the organization's sustainability work, including due diligence. An annual Transparency Act statement is published with detailed information about this work (according to the Norwegian Transparency Act). This is well established with the CEO, in the management and board, and who are committed to their obligations.

The main purchasing of material is done through our professional purchasing team, led by Head of Purchasing and Logistics. This includes responsibility for Supplier Code of Conduct for these suppliers, as well as other necessary documentation.

We are open and transparent about our work on due diligence and risk, and information is shared internally via the intranet and externally through our due diligence statement on our website.

The OECD model

Hallgruppen uses the OECD methodology with its six steps that show how companies can work more responsibly and sustainably.



Risk assessment

For our work with **potential negative risk**, Hallgruppen assesses supply chain risks, focusing on social risk by geography, industry sector and purchase value. In 2025 a total of 97% of purchases (194 suppliers) were mapped, with 15,3% of these identified as high risk and prioritized for follow-up.

Our prioritized negative impact/damage is related to manufacturing industries producing steel, aluminum, coated fabric, but also sandwich panels. Geographically, the risk is mainly related to suppliers in China, but also Vietnam, Baltics and Spain. There is also risk in relations to subcontractors within assembly, mainly in Baltics.

In relation to **actual negative impact**, third-party audits were conducted at five suppliers in 2025, two of which were also audited in 2024. Overall, improvements were seen in both actions and collaboration. Some non-compliances were identified, mainly in working hours and HSE conditions, and Corrective action plans were implemented with ongoing follow-up through meetings and documentation reviews.

Actions and measures to cease, prevent or mitigate negative impacts

Supplier Code of Conduct

Before starting new supplier collaborations, a preliminary risk assessment is conducted, and expectations are communicated through the Supplier Code of Conduct.

Hallgruppen improved monitoring of supplier signoffs on the Supplier Code of Conduct, focusing on different targets such as the top 30 and material suppliers.

Code of Conduct - Training for Employees

Online training increased employee knowledge of human rights and ethical standards. By 2025, 76% of employees completed the course, with a target of 100%.

Social Audits of Selected Suppliers

Audits identified breaches and improvement areas, leading to better conditions regarding health, safety, wages and working hours. New audits are planned according to company procedures.

Certification of Hallgruppen Companies

Certifications ensure systematic management, environmental compliance, workplace safety, and reduced social and occupational risks. Hallgruppen AS achieved Eco-Lighthouse certification (Jan 2026), and Hallgruppen Ltd obtained ISO 9001, -14001, and -45001 (Mar 2025).

Supplier onboarding procedure

A standardized procedure ensures new suppliers meet quality, legal and sustainability standards, and minimizes risks. This is actively followed by the procurement team.

Subcontractor Installation Control Procedures

Procedures and follow-up forms/checklists reduce human rights and labor risks. The implementation is complete in Norway; other countries have yet to start. our overall sustainability transition strategy and guide coordinated actions across operations and our value chain.

Targets on Supply chain risk assessment and compliance

Target	2024	2025	Target
Yearly risk assessment % of spend	98,99%	97%	Yearly
High risk suppliers % of spend	11,3%	15,3%	Yearly
Supplier code of conduct			
- Top 30 suppliers	75%	86%	100%
- Material suppliers	80%	84%	100%
Code of Conduct - Training for Employees	73%	76%	100%
Social Audits of Selected Suppliers	3	5	Yearly
Number of corrective action plans after Social Audit	3	5	Yearly
Certification of Hallgruppen Companies:			
ISO 9001, 14001 Eco-Lighthouse	UK - ISO 9001, 14001, 45001 Norway - Eco-Lighthouse		100% of the Groups major locations ISO certified

Remediation

Remediation is managed by ensuring compliance with our Supplier Code of Conduct, fostering strong, long-term supplier partnerships, and supporting suppliers in implementing positive improvements. Remediation measures include action plans, dialogue and contractual provisions.

In 2025, cases of remediation were addressed using action plans to correct supplier practices and internal procedures.

The company also has a well-established whistleblowing channel for internal and external parties (for more information on whistleblowing, see Own workforce chapter). Together with due diligence and reporting procedures, it helps identify and address negative impacts on human rights and decent working conditions.

Governance

A strong corporate culture, high ethical business practices, a resilient supply chain, mitigate risks and corruption are essential to be seen as a serious and reliable partner, and to attract and retain talented employees, as well as comply with ESG standards.

Impact, risk, and opportunity

- To ensure sustainable, innovative and strong cultural development, systematic and objective measures are needed.
- Strengthening our role as a responsible and attractive partner to customers and suppliers.
- Organizational dependency risk, by reliance on key personnel.

We strengthen our organisation through ethical business practices, clear policies, and a resilient value chain to support trust, compliance, and sustainable growth.



GRI: 2-23, 2-24

Policies

- Hallgruppen's **policies** related to business conduct:
- **Hallgruppen Code of Conduct** (updated 2025)
 - **Supplier Code of Conduct** (updated 2026)
 - Employee handbook

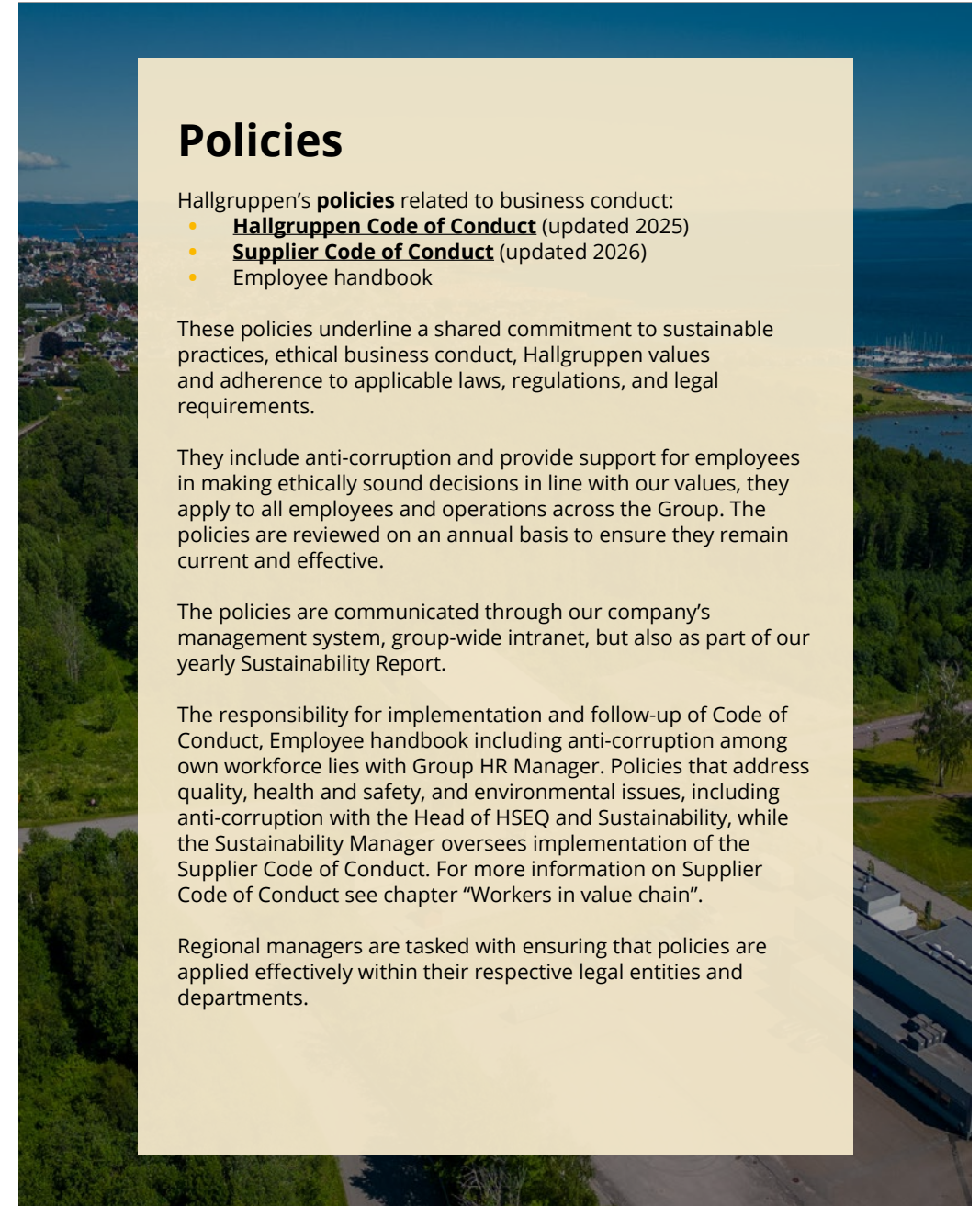
These policies underline a shared commitment to sustainable practices, ethical business conduct, Hallgruppen values and adherence to applicable laws, regulations, and legal requirements.

They include anti-corruption and provide support for employees in making ethically sound decisions in line with our values, they apply to all employees and operations across the Group. The policies are reviewed on an annual basis to ensure they remain current and effective.

The policies are communicated through our company's management system, group-wide intranet, but also as part of our yearly Sustainability Report.

The responsibility for implementation and follow-up of Code of Conduct, Employee handbook including anti-corruption among own workforce lies with Group HR Manager. Policies that address quality, health and safety, and environmental issues, including anti-corruption with the Head of HSEQ and Sustainability, while the Sustainability Manager oversees implementation of the Supplier Code of Conduct. For more information on Supplier Code of Conduct see chapter "Workers in value chain".

Regional managers are tasked with ensuring that policies are applied effectively within their respective legal entities and departments.





Business Conduct

Anti-Corruption

Hallgruppen has a zero-tolerance policy for bribery and corruption. Corruption undermines fair competition and weakens trust in society, and compliance with ethical guidelines and applicable regulations is crucial for a well-functioning society and business community. At Hallgruppen, our ethical business practices and anti-corruption work are integrated into Hallgruppen’s Code of Conduct that apply to all employees, contractors, board members, and anyone else who represents the company. All employees must sign the Hallgruppen Code of Conduct as part of the new employee onboarding process, as well as complete mandatory e-learning on anti-corruption as part of the company’s Code of Conduct online training.

Online training: Code of conduct (including anti-corruption)	Completion rate
2024	73%
2025	76%

All suppliers and subcontractors are required to comply with our Supplier Code of Conduct which includes Anti-corruption.

Hallgruppen’s operations, as well as our supply chain, are assessed for corruption risk.

B11-43

There were no cases of corruption, no violation of anti-corruption or anti-bribery laws in 2025, nor any of the preceding years. Therefore, there were 0 number of convictions, and 0 total amount of fines incurred for the violation of anti-corruption and anti-bribery laws.

Gender diversity in the governance body

Our industry is traditionally male dominated, and diversity, equality and inclusion remain issues that require attention. In 2024 the average ratio of female to male on the board increased to 0,5. The board consists of three individuals and complies with current expectations and new requirements for gender balance on the board.

C9-65

Board of Directors	0,5
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**Calculated as an average ratio of female to male.*

Corporate culture

Culture and Internal Communication

As a young organization, our culture is driven by innovative, knowledgeable and highly committed people. We differentiate ourselves by seeing opportunities where others see challenges.

Hallgruppen fosters a Scandinavian culture with open dialogue and low barriers for raising concerns. Various channels - such as employee appraisals, the working environment committee and the Group intranet - encourages engagement and participation. New employees receive monthly follow-ups during onboarding, including mandatory online training on topics like whistleblowing, code of conduct, and IT-security.

We aim to increase systematic and objective measurement of corporate culture and the working environment, where implementing an employee survey will be an important tool going forward.

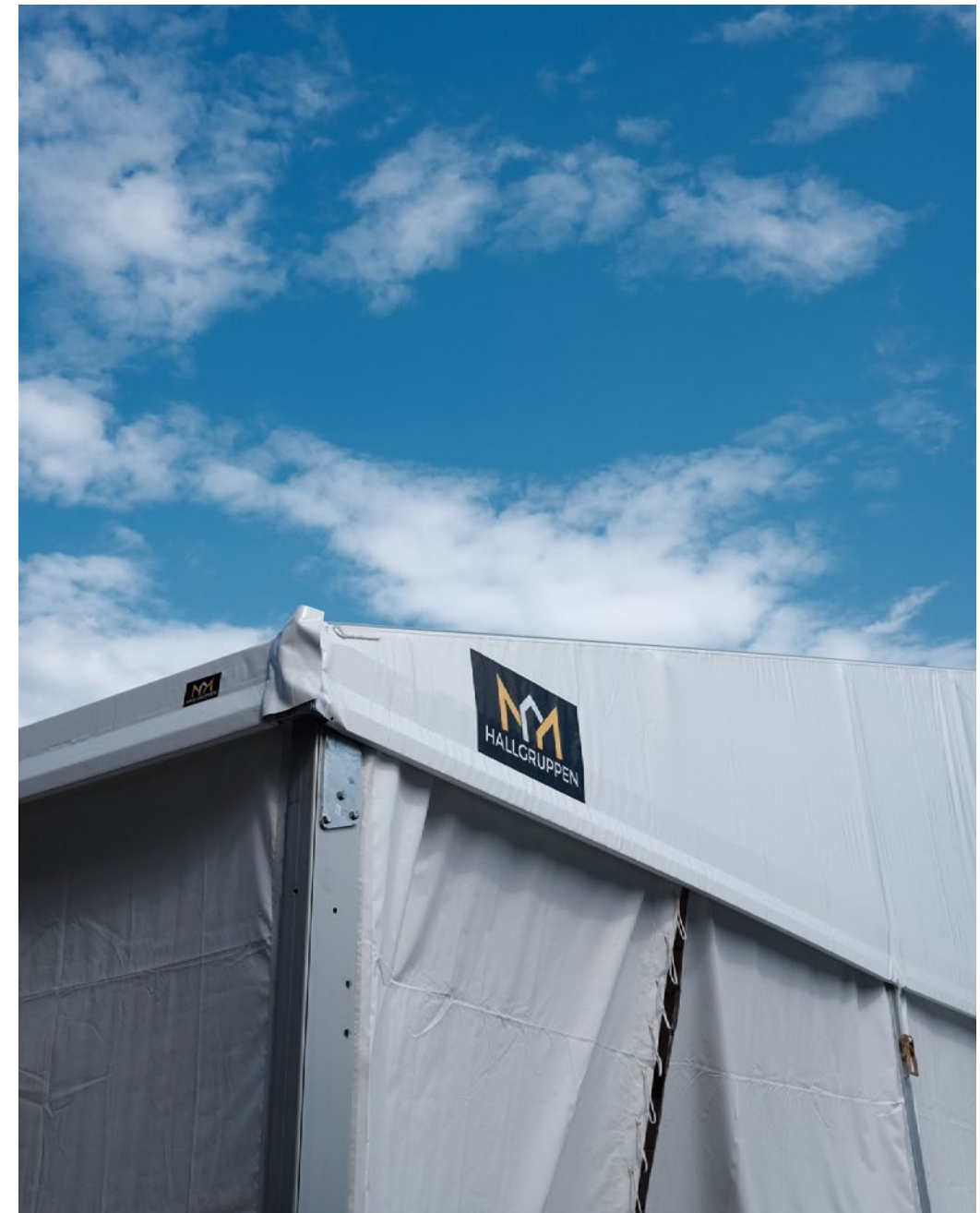
Management system

Given the company's strong growth over the past decade, ensuring stable and effective management systems is a priority, to prepare the organization for future sustainability initiatives.

Building on our values, policies and objectives, we continuously integrate key areas - including corporate culture and ethical business practices - into the management systems, promoting a holistic approach to compliance across functions and regions.

Our goal is to maintain and further develop our certifications across the Group in the years to come.

Target	2024	2025	Target 2030
Certification of Hallgruppen Companies: ISO 9001, 14001 Eco-Lighthouse		UK - ISO 9001, 14001, 45001 Norway - Eco-Lighthouse	100% of the Groups major locations ISO certified



Appendix 1 List of subsidiaries 2025

Subsidiaries and legal form abbreviation	Org. No.	Country operations	Registered office address	Geolocation: Latitude	Geolocation: Longitude	NACE sector classification code(s);	Number of employees in headcount	Sustainability-related certification or label
Hallgruppen AS	NO915846432	Norway	Karoline Eggens vei 3, 2016 Frogner	59.8820	10.6640	46.830	86	<p>EcoVadis Bronze medal: Sustainability Rating, issued by EcoVadis Jun 2026, score 67 of 100.</p> <p>Eco-Lighthouse certificate: Environmental Management Standard Compliance, issued by CERTNOR 19.01.2026, certification number: 189981</p> <p>Grønn Punkt Norge: Packaging recycling responsibility system, issued by Grønn Punkt Norge AS, member number 301211</p>
Hagu Rental AS	NO917294720	Norway	Karoline Eggens vei 3, 2016 Frogner	59.8820	10.6640	77.220	0	
Hallgruppen Sverige AB	SE5590202379	Sweden	Borrvägen 4, 155 93 Nykvarn	59.1050	16.5680	46.831 77.390	24	
Hallgruppen Aps	DK38614886	Denmark	Hasselvej 3-10, 4780 Stege	54.9930	12.1380	13.9600	25	Emballagretur: Packaging recycling responsibility system
Hg Ejendomme Denmark AS	DK42210137	Denmark	Hasselvej 5, 4780 Stege	54.9930	12.1380	68.2040	0	
Hallgruppen Baltics SIA	LV40203186254	Latvia	Gate 43, "Dominante Park", Ķekavas pagasts, Ķekavas novads, Rīga, LV-2123	56.8879	24.1154	49.90 25.11 77.21	32	
Hallgruppen Oy	FI3297993-8	Finland	Företagargatan 7A, 688 00 Källby	63.6190	23.0340	77.390	2	
Hallgruppen Ltd.	HRB37278HB	United Kingdom	Unit 9 Wayfields Park Rownall Road Wetley Rocks Stoke-on-Trent, ST9 0BP	53.0600	-2.2000	43.999	2	<p>ISO 9001: Quality Management system, issued by Interface NRM Ltd 02.04.2025, Certificate No: Q8944</p> <p>ISO 14001: Environmental Management, issued by Interface NRM Ltd 02.04.2025, Certificate No: E8944</p> <p>ISO 45001: Occupational Health & Safety, issued by Interface NRM Ltd 02.04.2025, Certificate No: H8944</p>
Hallgruppen Ireland Ltd	NI720596	Northern Ireland	22A Kilroot Business Park Carrickfergus County Antrim BT38 7PR Northern Ireland	54.7199	-5.8189	43.999	2	
Hallgruppen GmbH	HRB37278HB	Germany	Lise-Meitner-Str. 6, 28359 Bremen	53.0763	8.8075	N/A	0	
Hallgruppen Sp. Zo.o	0001043163	Poland	ul. Muchoborska 18, 54-424 Wrocław Gamma Building	51.1022	17.0370	25.11 41.20 68.20	1	
Hallgruppen UAB	306993921	Lithuania	Lvivo g. 25-104, LT-09320 Vilnius	54.689	25.280	N/A	0	

*Information is based on available information by the time of publication of this report.

*Overview of additional locations in country of registration is on our website.

*Legal form: Limited liability company.

Appendix 2 Stakeholder dialogue

The table provides an overview of the Hallgruppen’s most important stakeholders, where we engage with them, what is significant to them, and our approach to stakeholder engagement.

Stakeholders	Meeting place	Topics of interest to stakeholders	Follow-up and measures
Board of directors	Board meetings	Corporate governance Revenue and growth Compliance	Corporate reporting Information through meetings Sustainability report The Transparency Act report
Employees	Probationary period and appraisal interviews Daily dialogue with colleagues and managers Meeting activities New employee onboarding	Working environment Working conditions and salary Opportunities and challenges	Involved in annual performance reviews with immediate manager Involved through employees’ daily dialogue with managers Internal communication channels, AMU Fixed course programme for new employees, incl. Code of Conduct
Customers	Customer meetings Tender documents Ongoing dialogue Seminars and events	Collaboration on challenges and opportunities Expectations beyond the contract Price, delivery performance, complaints, ESG Code of Conduct and human rights LCA/EPD	Customer dialogues with key customers on topics such as sustainability, environment and climate ISO certification/EcoVadis Transparency Contribute to sustainable development with measures and reporting Dialogue with customers in and about projects Membership of UN Global Compact, Green Point Norway
Suppliers/ subcontractors	Supplier meetings Ongoing dialogue	Ensure good and serious suppliers Collaboration on ESG issues Human rights	Co-operation agreements/contract clauses Other requirements such as EPD/LCA Supplier Code of Conduct Supplier meetings and factory visits Social audits
Competitors and other similar businesses	Digital platforms Company reports	Strategy/ESG Pricing Competitive culture	Keep up to date on competitors strategies and sustainability efforts
Regulatory authorities / legislation	Contact with political environment and authorities through industry organizations Through customers in the public sector	Seriousness Compliance with laws and regulations Ethical operations and practices	Comply with laws and regulations Have good processes for compliance
Society and/or local community	Participation in industry forums Profiling, information and dialogue	Seriousness, job creation and environment	Initiate dialogue Profiling
The industry	Participation in industry forums Publications	Compliance with standards and frameworks	Dialogue and meetings Memberships

Appendix 3 UN Sustainable Development Goals

The Hallgruppen's prioritised sustainable development goals:



Goal 8: Decent Work and Economic Growth

8.8
We promote decent work and sustainable economic growth through clear internal guidelines, HSE policies, and responsible business practices across our value chain. Through our Supplier Code of Conduct and strategic partnerships, we work to ensure good working conditions, ethical standards, and compliance with labour laws. In our own operations, we focus on an inclusive and supportive work environment that promotes employee wellbeing, fair conditions, and work-life balance, supported by transparent internal and external reporting channels.



Goal 12: Responsible Consumption and Production

12.4
We ensure environmentally sound management of chemicals and waste throughout their life cycle through strict waste handling procedures and continuous monitoring of hazardous waste streams. Safe chemical management is supported by up-to-date Safety Data Sheets and accessible documentation for all relevant personnel. We also collaborate with professional suppliers that provide comprehensive environmental documentation, enabling responsible procurement and informed decision-making. In addition, we prioritize circular design principles such as durability, reusability, and design for disassembly to reduce environmental impact across the value chain.

12.5
We are committed to reducing waste generation through prevention, recycling, reuse, and improved resource efficiency across our operations. Our waste management efforts are guided by clear targets and performance indicators, including waste generation, waste intensity, and sorting rate. Through continuous monitoring and internal reporting, we work to increase recycling and minimize residual waste and disposal. These expectations are also communicated throughout our value chain through initiatives such as our Supplier Code of Conduct.



Goal 13: Climate Action

13.1
Our tents support climate adaptation by providing sustainable and relocatable solutions for climate-related hazards, including temporary shelter, protection, and food storage. Compared to traditional buildings, they require less groundwork, can be dismantled and reused, and have a significantly lower carbon footprint, helping to reduce overall environmental impact.

13.2
We report annually on our greenhouse gas emissions and have established initial reduction targets. To improve the accuracy of our Scope 3 emissions data, we are gradually transitioning from spend-based to activity-based calculations. This provides better insight into our value chain emissions and support more effective reduction measures.



Goal 17: Partnerships for the goals

Strong partnerships and collaboration are essential to achieving the Sustainable Development Goals. At Hallgruppen, we foster long-term relationships across our value chain and work with responsible partners who comply with our Supplier Code of Conduct, ensuring alignment with our standards for ethics, human rights, and environmental responsibility. As a participant in the United Nations Global Compact, we are committed to sustainable and socially responsible business practices and recognize that meaningful progress is achieved through collaboration.

Goals we contribute to through our own operations:



Goal 3: Good health and well-being

We prioritize employee health and wellbeing by offering occupational health services, additional health insurance, gym facilities, and employment training and development.



Goal 16: Peace, justice and strong institutions

Through our Scandinavian values and global presence, we maintain a strong commitment to preventing corruption and bribery in all forms. Clear guidelines, policies, and employee training through our Code of Conduct help ensure compliance, raise awareness, and promote ethical business practices throughout the organization.

Goals we contribute to through our activities:



Goal 2: Zero Hunger

Through the delivery of our Mobile Storage Units (MSUs), we support emergency relief efforts by providing temporary food storage solutions. With large stock capacities, we are able to deliver up to 10,000 m² of storage facilities in a single day, supporting the food programs of organizations such as the United Nations.



Goal 9: Industry, Innovation and Infrastructure

Contribute to economic development by providing temporary purpose-built structures at a more affordable cost than permanent buildings, thereby making the construction of hospitals, warehouses, and other facilities possible that otherwise would not have been built.



Appendix 4 VSME - List of omitted disclosures

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Appendix 5 GRI content index

Statement of use:

Hallgruppen AS has reported with reference to the GRI Standards for the period 01.01.2025 - 31.12.2025.

GRI 1 used:

GRI 1: Foundation 2021

GRI STANDARD	DISCLOSURE	LOCATION
GRI 2: General Disclosures 2021	2-1 Organizational details	4, Appendix 1
	2-2 Entities included in the organization's sustainability reporting	4, Appendix 1
	2-3 Reporting period, frequency and contact point	4
	2-4 Restatements of information	4, 19, 21, 24
	2-5 External assurance	N/A
	2-6 Activities, value chain and other business relationships	6-7
	2-7 Employees	4, 29
	2-8 Workers who are not employees	Not reported
	2-9 Governance structure and composition	9
	2-10 Nomination and selection of the highest governance body	9, The board of directors is elected in accordance with the Norwegian Companies Act (Aksjeloven)
	2-11 Chair of the highest governance body	9, Chair of the Board is not a senior executive in the organization
	2-12 Role of the highest governance body in overseeing the management of impacts	8-9
	2-13 Delegation of responsibility for managing impacts	8-10
	2-14 Role of the highest governance body in sustainability reporting	9
	2-15 Conflicts of interest	28
	2-16 Communication of critical concerns	28
	2-17 Collective knowledge of the highest governance body	9-10
	2-18 Evaluation of the performance of the highest governance body	Not reported.
	2-19 Remuneration policies	Not reported.
	2-20 Process to determine remuneration	Not reported.
	2-21 Annual total compensation ratio	Not reported
	2-22 Statement on sustainable development strategy	2, 5, 8-11
	2-23 Policy commitments	9-10, 13, 28, 37, 39
	2-24 Embedding policy commitments	9-10, 13, 28, 37, 39
	2-25 Processes to remediate negative impacts	5, 13, 27-28, 37-38, 40
	2-26 Mechanisms for seeking advice and raising concerns	28, 38
	2-27 Compliance with laws and regulations	5, 9, 28, 36, 40
	2-28 Membership associations	5
	2-29 Approach to stakeholder engagement	8, Appendix 2
	2-30 Collective bargaining agreements	30
GRI 3: Material Topics 2021	3-1 Process to determine material topics	8
	3-2 List of material topics	8
	3-3 Management of material topics	8-9

Appendix 5 GRI content index

GRI STANDARD	DISCLOSURE	LOCATION	SUSTAINABLE DEVELOPMENT GOALS (SDG)	UN GLOBAL COMPACT
GRI 201: Economic Performance 2016	201-2 Financial implications and other risks and opportunities due to climate change	13-14		<p>Environment</p> <p>Principle 7: Businesses should support a precautionary approach to environmental challenges; Principle 8: undertake initiatives to promote greater environmental responsibility; and Principle 9: encourage the development and diffusion of environmentally friendly technologies.</p> <p>Anti-Corruption</p> <p>Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.</p> <p>Environment</p> <p>Principle 7: Businesses should support a precautionary approach to environmental challenges; Principle 8: undertake initiatives to promote greater environmental responsibility; and Principle 9: encourage the development and diffusion of environmentally friendly technologies.</p> <p>Human Rights</p> <p>Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and Principle 2: make sure that they are not complicit in human rights abuses.</p> <p>Labour</p> <p>Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining; Principle 4: the elimination of all forms of forced and compulsory labour; Principle 5: the effective abolition of child labour; and Principle 6: the elimination of discrimination in respect of employment and occupation.</p>
	GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption		
GRI 302: Energy 2016	205-2 Communication and training about anti-corruption policies and procedures	40		
GRI 305: Emissions 2016	302-1 Energy consumption within the organization	17		
	305-1 Direct (Scope 1) GHG emissions	18-20		
	305-2 Energy indirect (Scope 2) GHG emissions	18-20		
	305-3 Other indirect (Scope 3) GHG emissions	18-20		
	305-4 GHG emissions intensity	21		
GRI 306: Waste 2020	305-5 Reduction of GHG emissions	16, 18-20		
	306-1 Waste generation and significant waste-related impacts	22-26		
	306-2 Management of significant waste-related impacts	22-26		
	306-3 Waste generated	24		
	306-4 Waste diverted from disposal	24		
GRI 308: Supplier Environmental Assessment 2016	306-5 Waste directed to disposal	24		
	308-1 New suppliers that were screened using environmental criteria	23		
GRI 401: Employment 2016	308-2 Negative environmental impacts in the supply chain and actions taken	15, 23		
	401-1 New employee hires and employee turnover	29		
	GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system		33
		403-2 Hazard identification, risk assessment, and incident investigation		33
		403-3 Occupational health services		34
		403-4 Worker participation, consultation, and communication on occupational health and safety		33-34
		403-5 Worker training on occupational health and safety		32, 34
		403-6 Promotion of worker health		34
		403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships		33-34
		403-8 Workers covered by an occupational health and safety management system		33, 35
403-9 Work-related injuries		35		
403-10 Work-related ill health		35		
GRI 404: Training and Education 2016	404-1 average hours of training per year per employee	30		
	404-2 Programs for upgrading employee skills and transition assistance programs	32		
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	29-32		
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	28		
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	28, 38		
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	28, 38		
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	28, 38		
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	38		
	414-2 Negative social impacts in the supply chain and actions taken	38		



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Hallgruppen AS