

Statement on due diligence 2025

Gjensidige Forsikring ASA Group



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Statement on due diligence, 2025, Gjensidige ASA

This statement applies to the year 2025. The statement covers the operations of Gjensidige Forsikring ASA (GF), including its subsidiaries Gjensidige Pensjonsforsikring (GPF), Gjensidige Mobility Group (GMG), REDGO Norway AS, and Flyt AS. This report is a consolidated statement for the Gjensidige Group and includes group-wide elements such as frameworks, guidelines, and procedures. In addition, it contains entity-specific elements for the companies within the group structure that are independently required to prepare their own statements.

Gjensidige forsikring ASA

Non-life insurance is our core business in Norway, Denmark, and Sweden. In addition, we offer pension and savings products in Norway through Gjensidige Pensjonsforsikring (GPF), as well as roadside assistance services through Gjensidige Mobility Group (GMG). Gjensidige's organisational structure and operations are described in the Group's Annual Report for 2025. See in particular the chapters Corporate Governance (pp. 176–187), Gjensidige's Business Model (pp. 31–32), our Segment Description (pp. 35–36), Investments (pp. 41–43), Our Own Workforce (pp. 142–153), and Workers in the Value Chain (pp. 154–163).

Gjensidige Pensjonsforsikring AS (GPF)

GPF is a wholly owned subsidiary of Gjensidige Forsikring ASA with its head office located in Oslo. At the end of 2025, the company had 140 permanent employees, and in principle all activities are carried out in Oslo. The majority of employees are involved in customer services. In addition, there are dedicated departments for marketing and digitalisation, product development, technical IT support/development, investments, and administrative functions.

The company's operations are directed toward the life and pension market, offering products to both private individuals and businesses. Pensions are a strategic priority

that enable Gjensidige to be a comprehensive provider of insurance and pension products for retail and corporate customers. The business helps strengthen customer relationships and loyalty across the Gjensidige Group. The company was established in 2005 and focuses on selling defined contribution pension schemes and risk coverages. The company offers products within the following main categories:

- Collective occupational pension – Defined contribution schemes with associated risk coverages
- Management of pension capital certificates and paid-up policies
- Individual pension savings (unit linked)
- Individual disability pension
- Investment-linked savings accounts (capital insurance)

The company offers exclusively externally managed funds as investment options. Distribution of the company's products takes place primarily through its parent company, GF. In addition, GPF makes use of other external partners. Private pension products are distributed online and through a dedicated advisory team. GPF's operations are further described in the annual report and on the company's website.

Gjensidige Mobility group (GMG)

GMG was established to lead GF's strategic initiatives within mobility. GMG owns Flyt and REDGO Sweden AB with a 100% ownership share. REDGO Sweden AB is the owner of REDGO Norway AS and REDGO Finland OY. REDGO Finland, in turn, owns REDGO Estonia EE and REDGO Lithuania. GMG also holds a 10.4% ownership stake in Spense AS. GMG is the parent company of the group. GMG AS carries several of the group functions for its subsidiaries, including the management of all functional areas, and provides support in finance, HR, IT, and business development.

REDGO Norway AS (REDGO)

Redgo provides roadside assistance services in Norway, including on-site assistance and repairs, towing and transport, as well as arranging rental cars/transport and accommodation. In addition, the company operates a customer service centre. The REDGO companies mainly consist of roadside dispatch centres in each country,



support functions, and company-owned roadside assistance stations in Oslo and Helsinki.

Flyt AS (Flyt)

Flyt is an issuer of toll tags and a payment operator for toll-road transactions in Norway. Flyt has customers across the country, with the largest share located along the coastline from Agder to Trøndelag.

At the end of 2025, the GMG Group had 411 employees, distributed across different parts of the business as follows:

- 21 employees work in GMG at the head office in Oslo. Most of these employees are engaged in group functions for the subsidiaries.
- 195 employees work in REDGO Norway AS, of which 38 are attached to the towing station in Oslo. The remaining employees are part of the customer service centre and administrative office.
- 40 employees work in REDGO Sweden AB
- 78 employees work in REDGO Finland OY
- 39 employees work in REDGO Lithuania
- 22 employees work in REDGO Estonia
- Flyt had 34 employees at the end of 2025.

1. Framework for Safeguarding Human Rights and Working Conditions

Human and labour rights are integrated into Gjensidige's governance and control system and are binding for the entire Group and all employees across all entities and countries.

In our governing documents, we base our approach on the UN Global Compact principles, which we have signed. We have also incorporated the UN International Bill of Human Rights and the ILO's fundamental conventions on human and labour rights, the UN Guiding Principles on Business and Human Rights, as well as the OECD Guidelines for Responsible Business Conduct as guiding frameworks for our policies. We have signed the UN Principles for Sustainable Insurance (UN PSI) and the UN Principles for Responsible Investment (UN PRI). The purpose of UN PSI and UN PRI is to ensure that sustainability, including human rights and labour rights, is integrated into our daily operations, within our supply chain, and in our investments. We have also signed the "Women in Finance Charter" (Norway), thereby committing to proactively improve gender balance in leadership positions. The Board of

Directors holds the overall responsibility for establishing requirements and guidelines that safeguard human and labour rights throughout our business and value chain. Group management has the operational responsibility for ensuring implementation across the organisation.

We carry out due diligence assessments to identify potential breaches of human and labour rights among our suppliers. We use the insights from these assessments to prevent and mitigate conditions that may negatively impact human and labour rights. If anyone suspects violations of human or labour rights, they can report their concerns through our notification channel (mittvarsel.no)

The Board of Directors has established overarching requirements for human and labour rights through the Board Policy for Corporate Governance, and requirements for responsible investments through the Board Policy for Financial Risk Management. In addition, the administration has developed the following governing documents:

- **Policy for ethical rules**
Our ethical rules shall ensure a strong corporate culture, appropriate conduct, and a positive reputation. The rules also bind all employees to contribute to safeguarding human and labour rights throughout our entire value chain.
- **Policy for sustainability**
The policy establishes principles and guidelines for how we take social conditions into account, including human and labour rights for workers in our value chain, as well as corporate governance across all our activities.
- **Policy for procurement**
The policy sets requirements and defines roles and responsibilities for the procurement process in Gjensidige. Compliance with these requirements ensures that Gjensidige acts as a professional and independent participant in supplier markets, and that Gjensidige conducts appropriate assessments of risks related to compliance with human rights as described in the UN Global Compact principles, and labour rights (ILO).
- **Supplier code-of-conduct**
We require all suppliers to sign the Self-Declaration on Corporate Social Responsibility (Supplier Code of Conduct). In doing so, our suppliers commit, at a minimum, to complying with the 10 UN Global Compact principles.



- **Policy for responsible investments**

The purpose of the policy is to ensure that our investments take into account the objective of achieving the highest possible long-term return while ethical and environmental principles are respected in the best interests of our stakeholders. Our asset management is based on the 10 UN Global Compact principles, the OECD Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights. This is to ensure that minimum requirements for human and labour rights are upheld. If we identify significant breaches of these principles that are not addressed in a credible manner, the company will be excluded from Gjensidige's investments.

- Our Policy for responsible investments is supplemented by a separate *Instruction for Exclusions* and an *Instruction for Active Ownership*, which provide more detailed guidelines and criteria for, among other things, when and how exclusions shall be carried out.

- **Policy for inclusion, diversity and belonging**

The purpose of the policy is to provide a framework for attracting, identifying, developing, and including a broad diversity among our employees. Our work on diversity is about leveraging each other's differences. This means that we recognise employees' knowledge, competencies, and strengths regardless of possible grounds for discrimination, such as gender, pregnancy, parental leave related to birth or adoption, caregiving responsibilities, ethnicity, religion, belief, disability, sexual orientation, gender identity, and gender expression, as well as combinations of these.

To access our governing documents, please see our Policy Library: [Policy library – Gjensidige.com](https://gjensidige.com/policy-library)

1.1. OUR EMPLOYEES

All our employees have full freedom to organise themselves in trade unions, and the unions have unrestricted access to recruit members among our staff.

A large proportion of our employees are covered by collective bargaining agreements negotiated between the trade unions and the company. Employees in the Group are, in accordance with Norwegian law, entitled to be represented in the company's governing bodies. The

employee representatives are elected by and among the employees. In connection with organisational changes, the company's management maintains close dialogue with the employees' elected representatives.

Employees are, under Norwegian law, entitled to be represented in the company's governing bodies. In the Board of Directors of Gjensidige Forsikring ASA, three employee representatives serve, elected by and from among the employees. For our employees, the Basic Agreement between Finance Norway and the Finance Sector Union, together with the provisions of the Labour Disputes Act, forms the basis for and provides the rules governing negotiations for establishing collective agreements. Gjensidige has a corresponding basic agreement with Tekna and the Norwegian Association of Lawyers (Juristforbundet).

The agreements contain provisions governing the relationship between the parties and the rights and obligations of employee representatives, and form the basis for cooperation between employer and employees. These agreements set out detailed provisions on how employees, through their elected representatives, shall be ensured influence in matters related to employment and working conditions. The agreements also set requirements for work on facilitating diversity and gender equality. Through influence and cooperation—including regular cooperation meetings between employee representatives and management, and employee representation on the Group Board—employees, with their experience and insight, shall contribute to ensuring predictable and sound working conditions in the company and be provided with opportunities for personal development.

For GMG's employees, the Basic Agreements with Pareto and Fagforbundet, together with the provisions of the Labour Disputes Act, form the basis for and provide the rules governing negotiations on establishing collective agreements. The agreements contain provisions regulating the relationship between the parties and the rights and obligations of employee representatives, and they constitute the foundation for cooperation between employer and employees. These agreements set out detailed provisions on how employees, through their elected representatives, shall be ensured influence in matters concerning employment and working conditions. The agreements also require efforts to promote diversity and gender equality. Through influence and cooperation—including employee representation on the Group Board—employees, with their experience and insight, shall



contribute to ensuring safe and sound workplaces within the company and be provided opportunities for personal development.

Cooperation between Group management and the employees' trade unions is orderly and constructive, and follows an established structure with regular meetings. The employee representatives and the company's management shall jointly make their best efforts to create and maintain good cooperation within the company, seek to eliminate any areas of friction, and help ensure that work regulations, agreements, collective bargaining provisions, and related legislation are complied with.

Four meetings of the Group Working Environment Committee (AMU) and four meetings of the Cooperation Committee (SU) are held each year. The Working Environment Committee is a statutory body intended to improve the working environment in a workplace. AMU is composed of representatives from both employer and employees. The committee participates in the planning and organisation of health, safety and environmental work and shall contribute to creating and further developing good cooperation within the company. It shall stimulate employees' interest in the company's tasks, finances, and operational results. Furthermore, it shall ensure that the company's recruitment and training policies reflect the knowledge and competence requirements expected for future operations. In the SU, planned changes to the business of significant importance, as well as planned measures affecting the employment and working conditions of larger groups of employees, are also discussed. Employee representatives participate in recruitment processes and in the annual local wage negotiations. The company invites representatives to regular informal meetings, and they also have meeting arenas with relevant members of Group Management. Clear rules specify which processes and decisions employee representatives must be involved in. Employee representatives are paid by the company.

In accordance with the Basic Agreement between Finance Norway and the Finance Sector Union, a Diversity and Equality Committee has been established with an equal number of representatives from the employer and employee sides. In recent years, the committee has focused particularly on the work related to the activity and reporting obligations. Meetings are held as needed.

Notification channel

There shall be a low threshold for reporting concerns about inappropriate conditions, and everyone has a duty to

report matters that are criminal or that pose a risk to life or health. We therefore encourage employees to contact their manager, the People department, the HSE officer, a union representative, or a safety representative. We have an ethics mailbox in all countries for reporting misconduct and matters related to ethics. The People department follows up reports submitted through this channel. We also have a reporting channel for incidents that may threaten the safety or well-being of our employees. The ethics mailbox and the reporting channel are available on our intranet and on Gjensidige.no. Our internal investigation unit handles these cases with the highest priority. We have clear guidelines for managing such incidents and ensure swift and effective handling. We provide support to employees and implement necessary measures to ensure a safe working environment.

The notification channel enables anonymous reporting and two-way communication with anonymous whistleblowers. This makes the channel safe and effective, helping to lower the threshold for reporting.

HSE

We conduct an annual HSE survey that forms the basis for the HSE risk assessment and subsequent measures. The survey also covers employees' experiences related to exposure to threats, unwanted sexual attention and bullying, or witnessing colleagues being subjected to such incidents. In addition, annual independent HSE audits are carried out to ensure compliance with legal requirements and our internal HSE procedures. We have a dedicated HSE officer who ensures that the survey is distributed, that results are followed up, and that necessary measures are implemented.

For each department, we define action plans that are followed up by the respective managers, while departmental HSE risk assessments are carried out. The risk assessment is conducted in a new tool for risk assessment and internal control, integrating HSE into Gjensidige's overall operational risk management framework. This facilitates the aggregation and documentation of HSE risk, as well as clear and structured follow-up of mitigation measures.

For GMG, working environment topics are integrated into an annual HSE survey to identify any conditions requiring special follow-up. REDGO Norway has its own (annual) HSE survey. In addition, REDGO Norway prepares an HSE action plan, which is followed up, and conducts an HSE risk



analysis. GMG also works continuously to ensure equality and non-discrimination. REDGO has its own deviation and reporting system, where employees can use a mobile app to register accidents and near-misses. A notification is then sent directly to the employee's manager and to the HSE officer in REDGO.

REDGO Norway has a female share of 47%. The company also employs female tow truck operators. REDGO Norway has extensive cooperation with NAV and has hired many employees through this partnership.

Engagement surveys

Up to four times a year, all employees in the Group have the opportunity to express their views on what it is like to work at Gjensidige, including psycho-social conditions. All responses are anonymous. The survey includes a wide range of questions across several categories, covering everything from the level of freedom of expression to managerial support and opportunities for development. Managers review the results with their departments and implement measures. Actions are taken to strengthen areas that are functioning well and to improve areas that are not satisfactory. If a department scores below a certain threshold, it will be followed up by its respective People Partner.



1.2.SUPPLIERS

All suppliers must sign a Self-Declaration on Corporate Social Responsibility (Supplier Code of Conduct), which as a minimum requires compliance with the UN's 10 Global Compact principles. In addition, selected suppliers are screened and followed up through a sustainability audit conducted by the external rating agency EcoVadis.

By their self-declaration, suppliers confirm that they will:

- Ensure that guidelines related to internationally recognised principles for human and labour rights are complied with, and that they impose corresponding requirements on their subcontractors of goods and services.
- Ensure that the products we procure maintain high environmental quality, that the precautionary principle is adhered to and that environmental technology is implemented as far as possible.
- Comply with ethical requirements, including anticorruption.

Companies that deliver services related to the repair or replacement of damaged buildings in Norway must be qualified in StartBANK. StartBANK is a supplier registry used by purchasers in the construction, civil engineering, property management, insurance, and real estate sectors. For other procurement categories, our internal procurement organisation performs equivalent checks.

This ensures that qualified suppliers are reliable and that competition takes place on equal terms. All significant purchases are ordered electronically. All suppliers shall, as far as possible, submit invoices electronically. Tender processes are carried out using digital portals. The use of digital tools ensures that all processes are documented and verifiable. It prevents misconduct and reduces paper consumption.

A large share of our claims-related procurement is regulated through framework agreements, which enable us to conduct systematic quality control and contribute to supplier development. Our framework agreements include requirements for self-monitoring and documentation, as well as follow-up on social and environmental responsibility, including labour rights and compliance with statutory rights and obligations. We carry out due diligence assessments and conduct further investigations of suppliers we consider to pose a risk of violating such rights

and obligations. By being proactive, we can influence and contribute to more responsible business practices.

We monitor whether our key suppliers comply with their Self-Declaration on Corporate Social Responsibility (supplier code-of-conduct) through the recognised platform and external rating agency EcoVadis. Through the portal, suppliers must answer questions related to the environment, working conditions, ethics, and their requirements for subcontractors. The companies receive a score and feedback on areas for improvement. We engage in dialogue with suppliers that need to address identified weaknesses. We consider non-compliance with our requirements to be a breach of contract. To encourage improvement across the value chain, we require suppliers of services related to motor vehicle and building repairs to have a target of achieving at least a Silver score in EcoVadis.

In Gjensidige, the Group Procurement department is responsible for screening companies in our value chain through external rating agencies, communicating our expectation that they register information in the portal, and following up on suppliers' compliance through reporting to the portal. We influence suppliers to maintain at least a score that demonstrates they have adequate management systems in place for monitoring human and labour rights in their value chains.

Gjensidige's external notification channel is open to external stakeholders, including employees in our value chain. We also describe our notification channel when entering into agreements with suppliers and in our ongoing communication with them, to ensure that their employees are aware of it.

1.3 INVESTMENTS AND ASSET MANAGEMENT

For our investments and asset management activities, we aim to make a broad contribution to the protection of human rights through responsible investment practices. Our work is based on the relevant principles of the UN Global Compact and is structured to be in accordance with the UN PRI. We conduct quarterly follow-ups to ensure that all companies we invest in comply with our requirements. This is done either through direct dialogue or through our asset managers. When breaches are identified, we engage in dialogue, and if we are unable to influence the company, exclusion becomes an important measure.



This is regulated in the Instruction for Exclusions. See also the chapters “Investments” and “Workers in the Value Chain” in our 2025 Annual Report.



2. Procedure for conducting due diligence

Due diligence assessments are carried out to analyse the risk of violations of fundamental human rights and decent working conditions across the different parts of our internal operations, within our supply chains, and among other business partners.

2.1. OWN EMPLOYEES

The risk of violations of human rights and decent working conditions within our own operations is assessed through:

- Mapping of risks within our own operations for each country and each type of company in which we operate.
- Review of the annual HSE risk assessment and the process for preparing the Statement on equality.
- Analysis and follow-up of risk events in the Group's risk events register and incidents reported to internal investigations through the whistleblowing channel and other internal sources.
- Monitoring of submissions to the ethics mailbox.

We will work to further develop routines for conducting due diligence assessments within our own operations, including establishing an annual cycle for this work to ensure more effective coordination with existing processes for HSE risk assessments, equality and non-discrimination efforts, and the results from the MyVoice and PeopleXact engagement surveys.

2.2. SUPPLIERS AND BUSINESS PARTNERS

The work is prioritised based on risk and materiality, using the following criteria:

- **Volume:** Suppliers with high procurement volume.
- **Country:** Suppliers located in high-risk countries with respect to violations of human and labour rights.

- **External rating score** (e.g., Sustainalytics, EcoVadis, exclusion lists).
- **Companies with known incidents** related to breaches of human rights and decent working conditions.

Suppliers that meet one or more of the criteria are assessed further to clarify the level of risk. Suppliers deemed to represent high risk based on at least one of these criteria shall be evaluated individually. Investigations must be carried out to assess the risk of potential and actual negative impacts on human rights and working conditions. Examples of specific risks within these areas that are most relevant to Gjensidige's operations include:

- Risk of violating fundamental rights, particularly those set out in the Working Environment Act.
- Risk of inadequate protection of health, safety, and the environment in the workplace.
- Risk of wages that are not sufficient to ensure a living income.
- Risk of breaches of working time regulations, rest periods, holidays, and time off.
- Risk of lack of freedom of association.
- Risk of discrimination and lack of gender equality.
- Risk of violations of the right to privacy, including data protection.

Other risks of violations of human rights and decent working conditions may also occur and must be included in the assessment when relevant.

Further investigations will primarily involve collecting information and documentation from external sources and from the supplier itself. Relevant checks and investigations may include searches in open sources (the supplier's website, publications, and its own statement), completed EcoVadis assessments, information from supplier follow-up and audits, and responses to a self-assessment questionnaire.

Based on the results of these additional investigations, the risk associated with the specific supplier must be assessed, and further measures must be implemented if necessary.



3. Risk assessments relating to labour and human rights and results of measures

Through our risk assessments, we have examined which areas affect us the most in order to identify the parts of the human and labour rights domain where we face the highest risk of non-compliance. Based on this assessment, we have identified particularly challenging areas that require close follow-up. The risks listed here apply to Gjensidige Forsikring ASA as a Group, while specific risks related to the subsidiaries are described in Sections 3.1.1 to 3.1.4.

3.1 OWN EMPLOYEES

In general, the risk of violations of human rights and decent working conditions for employees in the Group is considered to be low. The areas where elevated risk has been identified are summarised below.

Risk of insufficient work-life balance

In the sustainability report in the 2025 Annual Report (pp. 145–153), a risk related to working conditions—specifically work-life balance—has been identified. High workloads over time, digital collaboration tools on mobile devices that increase expectations of availability, as well as the use of home offices, may blur the boundaries between work and personal life and create an unhealthy balance. See page 148 of the Annual Report for measures aimed at preventing and managing this risk.

Most employees have regular working hours, but shift work is carried out in the customer centres and at REDGO. Individual adjustments are made where possible. See also further descriptions, measures, and results relevant to REDGO in section 3.1.3.

Risk of discrimination or lack of equal treatment of employees

In the sustainability report in the 2025 Annual Report (pp. 158–164), risks related to equal treatment and equal opportunities for all have been identified. In addition, targets have been set to reduce some of these risks.

The Equality and Anti-Discrimination Statement provides detailed information on how Gjensidige has worked with discrimination, equality, and diversity. HR, in cooperation with the Diversity and Inclusion Committee, has worked to identify and assess risks of discrimination and barriers to equality. See our Equality and Anti-Discrimination

Statement at *Redegjørelser – Gjensidige.com* for information on the most relevant risks in Gjensidige, the measures that have been implemented, and the results of these measures.

Measures to prevent and manage risk include:

- Instructions on diversity and instructions for handling irregularities and misconduct.
- Procedures for preventing and managing bullying, available to all employees in the HSE handbook.
- An ethics mailbox and a notification channel where employees can report observations and incidents.
- Equality and non-discrimination are included in the annual performance review with managers and are regularly featured as topics in the anonymous MyVoice surveys.

Results of the measures:

- Seven reports were received relating to six incidents of discrimination and harassment in 2025. The incidents were handled as irregularities in accordance with the Instruction for Handling Irregularities and Misconduct.
- In 2024, we recorded an increase in discrimination and harassment cases, which we assessed as a consequence of organisational changes. The number of cases has since normalised, supporting this assessment.

The MyVoice engagement survey shows that employees consistently give Gjensidige a high and stable score on equality.

Risk of violence and threats from customers (potential, current, or former)

The most significant risk faced by our employees is the risk of violence and threats from customers.

This is limited to customer advisers and others who have direct contact with customers.

Measures to prevent and manage the risk include:

- Instructions and process descriptions for handling threats, threatening behaviour and violence are available to all employees in the HSE handbook.
- Preventive measures include training in applicable reporting procedures, guidance on how to act in



difficult situations, annual training on threat scenarios, proper staffing planning, and alarm systems in reception areas.

- When necessary, a dedicated response team is convened, including representatives from Investigations, Group Security, the relevant manager, and HR.
- Each case is assessed and handled individually by Internal Investigations, including decisions on whether the matter should be reported to the police, whether healthcare services should be involved, and the short-term and long-term measures required to follow up and protect employees or to manage the individual making the threat.
- We have identified specific factors that increase the risk of threats in various situations, and we have identified risk-reducing measures and provided training in these.

Results of measures:

- A total of 23 threat-related cases were registered in 2025. All of these were handled by Internal Investigations. The cases were followed up either through dialogue and guidance for the person affected (often in consultation with the manager), or through direct dialogue with the individual making the threat where this was considered appropriate.
- Early dialogue is often sufficient, and the risk has not materialised. There were no cases in 2025 that required activation of the response team or implementation of special security measures.
- There is one case from 2024 that was handled by the response team, where the implemented physical security measure (object protection) is still ongoing.

Employee privacy

As an insurance company, we process a wide range of personal data about both customers and employees. The processing of personal data involves an inherent risk that such data may be compromised, including employee data.

Increased use of AI and technological developments—particularly related to collaboration tools—may challenge employee privacy. This is an area we pay close attention to. Since the protection of customer privacy is a high priority within the Group, there is also strong awareness and competence related to employee privacy.

Measures to prevent and manage the risk include:

- Governing documents for the handling of personal data applicable to both customers and employees, including the employee privacy policy, the employee privacy notice, and associated procedures.
- Dialogue with employee representatives on matters concerning employees.
- Regular training for employees and managers on the processing of personal data.
- The Data Protection Officer provides advice on privacy matters concerning both customers and employees, and monitors and controls compliance.
- We have a network of representatives from various departments with specific responsibility for privacy. We have well-established processes for handling privacy incidents and for notifying affected individuals in the event of a breach.

Results of measures

No deviations involving employee personal data were reported in 2025 that resulted in a high risk for employees. Each deviation was assessed individually, and measures were implemented. No negative consequences for employee privacy are known.

3.1.1. Gjensidige Pensjonsforsikring AS (GPF)

For 2025, two cases related to harassment/discrimination were registered at GPF. The matters were handled in accordance with the Instruction for Irregularities and Misconduct, and the cases have been closed.

No threat-related cases from customers towards GPF or its employees were registered in 2025.

3.1.2. Gjensidige Mobility Group AS (GMG)

In general, the risk of violations of human rights and decent working conditions for employees in GMG is considered to



be low. None of the threat, harassment, or discrimination cases registered in 2025 concerned GMG.

3.1.3. REDGO Norway AS.

For 2025, one case related to harassment/discrimination was registered at REDGO. The matter was handled in accordance with the Instruction for Irregularities and Misconduct, and the case has been closed.

The areas where elevated risk has been identified are summarised below.

Risk of inadequate protection of health, safety, and the environment in the workplace

The most significant risk within our own operations is the risk of workplace accidents that may result in personal injury in connection with roadside assistance assignments and minor on-site repairs. The risk is mainly limited to employees at the towing station who perform this type of work.

Measures to prevent and manage the risk include:

- Units equipped with first-aid kits are placed at all locations and must be easily accessible and subject to regular inspections.
- Corrective measures are implemented immediately to address each individual injury that occurs.
- The HSE handbook, which includes procedures related to injuries and accidents, as well as process descriptions for handling deviations and safety incidents, is available to all employees.
- All new employees receive HSE training, including both general training and role-specific training depending on their duties.
- An HSE survey was conducted among all employees in 2025.
- An important safety measure for both customers and recovery personnel is the use of a buffer vehicle (Truck Mounted Attenuator) at accident sites on high-speed roads.
- Measures will be considered to ensure sufficient knowledge of deviation-reporting procedures within the REDGO companies in all countries.

Results of the measures:

- Four personal injury incidents were registered in the deviation-handling system in 2025. Each incident was handled in accordance with deviation-management procedures, and a root-cause analysis was conducted. No need for additional preventive measures or improvements to processes and routines was identified as a result of the specific incidents that occurred.
- Analysis and consideration of further measures following the HSE survey are ongoing.

Risk of violence and threats from externals

Employees performing vehicle recovery occasionally assist the authorities with the seizure and towing of vehicles. In connection with such assignments, employees may be exposed to demanding situations and unpredictable reactions from external parties.

Measures to prevent and manage the risk include:

- Risk analyses, including Safe Job Analyses for individual tasks and safety reviews.
- Action plan for managing high-risk conditions.
- Procedure for handling and reporting threatening behaviour.
- Emergency response plan for follow-up after a threat incident.
- Access control at all office locations across all three entities.
- Surveillance systems at the customer service centre, the towing station, and in some of the towing vehicles.

Results of measures:

For 2025, one threat-related case was registered at REDGO. The matter was handled in accordance with the Instruction for Irregularities and Misconduct, and the case has been closed.

Risk of breaches of working-time regulations

There is an elevated risk of breaches of working-time regulations, particularly overtime rules, during selected periods with a high need to assist customers with roadside services. The risk is mainly limited to periods with a high volume of customer inquiries due to external events



related to weather and road conditions. This risk may affect both customer-service employees and employees performing vehicle-recovery assignments.

Measures to prevent and manage the risk include:

- Time registration is carried out by employees and monitored continuously by the area manager.
- Follow-up of results from employee surveys.
- Dialogue with safety representatives and employee representatives regarding the safeguarding of safety, health, and welfare.
- Training of managers in the relevant regulations.
- Increased competence in workforce planning.
- Relief through increased use of temporary staff and part-time employees.
- Monthly control of overtime hours, involving both HR and management.

Results of measures:

- In 2025, we had a few deviations from overtime regulations. Each deviation was handled in accordance with established procedures. The safety representative and union representative were involved, managers were followed up with corrective actions, and accommodations were made where relevant.
- There have been no further deviations after the specific measures were implemented.

3.1.4 Flyt AS

In general, the risk of violations of human rights and decent working conditions for employees in Flyt AS is considered to be low. None of the threat cases or discrimination or harassment cases registered in 2025 concerned Flyt.

3.2 SUPPLIERS AND BUSINESS PARTNERS

In our due diligence assessments, we identify and evaluate the materiality and risk of our operations having a negative impact on fundamental human rights and decent working conditions in our supply chain.

No actual negative impacts or violations of human rights or decent working conditions have been identified among suppliers and business partners, and the overall risk is

considered to be low. The areas where elevated risk has been identified are summarised below. We primarily purchase services from our suppliers, and to a lesser extent goods. In total, we have more than 9,000 suppliers across administrative and claims-related procurement.

3.2.1 Administrative procurement

Administrative procurement includes office rentals, outsourcing services, office equipment, travel services, and other items necessary for our employees to perform their work. These suppliers are both local and international. These procurements are significant in scope and therefore represent an important area for Gjensidige to monitor. Some administrative procurement is linked to foreign suppliers, including in India, which we pay particular attention to and follow up by, among other things, assessing the working conditions of the suppliers' employees.

Staffing and cleaning industry: Cleaning is generally an industry with a high risk of breaches of decent working conditions and a risk of inadequate HSE standards in the workplace. Staffing and cleaning are also considered vulnerable sectors in terms of social dumping and labour market crime (Source: Fafo Report 2019:35 Human Trafficking in Working Life).

Measures to prevent and manage the risk include:

- Regular status meetings with our suppliers, including follow-up on sickness absence and on our duty to inform and ensure that wages and working conditions are satisfactory.
- Ensuring that suppliers hold the required approvals and certifications.
- Additional assessments have been carried out for the two largest suppliers within staffing and cleaning, in accordance with our due diligence procedures.

Geography: Gjensidige has a limited number of suppliers located outside our main areas of operation. Suppliers outside our operating region include those from the United Kingdom, Poland, the United States, Ireland, Israel, and India. Suppliers operating in India, Israel, and the United States have been identified through our due diligence



assessments as having the highest risk of violations of human rights and decent working conditions.

India has the lowest score on the Global Rights Index, which indicates the level of respect for labour rights in a country. This is due, among other factors, to repressive labour laws, lack of freedom of association, and violent attacks on protesting workers (Source: Global Rights Index 2025).

The index for political instability and/or politically motivated violence in Israel has reached a critical level in connection with the war in Gaza. According to the Responsible Sourcing Tool, Israel has a moderate risk of labour-related human trafficking, but active war and conflict can weaken the rule of law and potentially increase this risk (Source: Responsible Sourcing Tool). The conflict may also worsen other labour rights, especially for Palestinian workers in Israel. There have been cases of withheld wages and benefits, as well as long-standing discriminatory practices based on strict and restrictive work and entry permits (permit system) (Sources: *Workers' Rights in Crisis*, International Trade Union Confederation Report 2022; *Israel's Genocide Against Palestinians in Gaza*, Amnesty International Report 2024).

The risk of violations of human rights and labour rights in the United States increased significantly during 2025. According to Human Rights Watch and Amnesty International, the year was marked by authoritarian tendencies, weakened rule-of-law principles, and targeted attacks on vulnerable groups. Federal authorities introduced policies and measures that reduced legal protections, restricted freedom of expression and association, and weakened workers' rights (Sources: World Report 2026 – United States chapter, Human Rights Watch; Ringing the Alarm Bells, Amnesty International 2026).

The United States has ratified only 2 of the ILO's 10 core conventions, which constitute a minimum set of rights to be respected in working life. Supply chains linked to countries that have not ratified the core conventions may be more exposed to trafficking and forced labour. Failure to ratify these conventions may indicate a lack of commitment and political will to combat labour trafficking and to ensure good working conditions and fundamental labour rights (Source: Responsible Sourcing Tool).

The United States has the second-lowest score on the Global Rights Index, indicating that workers in the country have reported systemic violations of labour rights, and that authorities and/or companies contribute to undermining fundamental rights. In particular, the right to organise and to form trade unions is heavily regulated and counteracted through various measures (Source: Global Rights Index 2025).

Measures to prevent and manage the risk include:

- Further assessments of the suppliers are ongoing in accordance with our due diligence procedures.
- Regular evaluations of country and company-specific risk are carried out.
- On-site audits have been conducted for selected suppliers.
- Supplier-monitoring routines will be further developed, including indicators and follow-up points related to labour and human rights.

3.2.2 Claims-related procurement

Claims-related purchases are purchases from workshops/auto repair shops, craftsmen and others who carry out repairs or in other ways provide services to our customers in connection with claims settlements. In most cases, these types of suppliers have a national and local affiliation in the countries we operate in. This is a natural consequence of repairs having to be carried out where the damage occurs. We thereby contribute to considerable regional and local value creation in all the countries we operate in.

The construction industry generally has a high risk of violation of decent working conditions, such as good health and safety in the workplace. The industry is also considered vulnerable with regard to social dumping and work-related crime (Source: Fafo report 2019:35 Menneskehandel i arbeidslivet). As a purchaser of building and construction materials, we are exposed to high product risk through suppliers in the building and construction industry (Source: DFØ's High Risk List).

Gjensidige purchases large volumes, and thus has the power to exert influence on suppliers and negotiate good prices. This can result in low margins for suppliers, possibly



at the expense of HSE work, or contribute to low wages and social dumping.

Measures to prevent and manage the risk include:

- Further investigations are being carried out in line with our due diligence procedures for seven nationwide suppliers that account for 80–85 per cent of the repair volume in property claims.
- We have established a sound system for supplier follow-up and control in connection with property damage repairs, which means that sustainability and compliance requirements are regularly reviewed.
- We will consider further developing indicators and follow-up points for HSE / decent working conditions and living wages.

The automotive and repair shop industry is generally associated with high risk of violations of decent working conditions, including a risk of low wages, undue withholding of wages and other coercion-like situations (Source: Ethical Trade Norway, Møller Mobility Group). There may also be a risk of inadequate attention to health and safety in the workplace. Further down the supply chain, car rental and subsequent purchase will be associated with high product risk. The production of cars and vehicles, batteries and tyres is on DFØ's High Risk List. Car production primarily entails a risk of human rights violation in the production of components and extraction of raw materials.

Gjensidige purchases large volumes, and thus has the power to exert influence on suppliers and negotiate good prices. This can result in low margins for suppliers, possibly at the expense of HSE work, or contribute to low wages and social dumping. In particular, social dumping may be most relevant for smaller suppliers in the automotive industry (for example local auto repair shops).

Measures to prevent and manage the risk include:

- Further investigations are being carried out of the largest suppliers in the automotive industry in line with our due diligence procedures.
- Furthermore, we will analyse our supplier database and carry out more thorough investigations of smaller suppliers.
- We have established a system for supplier follow-up and control in connection with car damage repairs,

which includes regular reviews of compliance with sustainability requirements.

- We will further develop indicators and follow-up points for HSE / working conditions and living wages.

3.2.3 Gjensidige Pensjonsforsikring AS (GPF)

The risk areas relevant to GPF are described in section 3.2.1, Administrative Procurement.

3.2.4 Gjensidige Mobility Group AS (GMG)

Industry risk – staffing: The staffing industry may be characterized by risk factors such as a high proportion of unskilled labor, few formal competence requirements, a large share of foreign workers, and atypical forms of employment. This means that staffing is considered a vulnerable industry with regard to social dumping and labor market crime. (Source: Fafo Report 2019:35 *Human Trafficking in Working Life*).

This risk area is linked to GMG, REDGO, and Flyt, as all of them have suppliers within this industry.

Measures to prevent and manage the risk include:

- Additional investigations are carried out for the largest staffing suppliers in accordance with our due diligence procedures.

Geographical risk: Within administrative procurement, GMG shares suppliers with GF ASA. Some of these have been selected for more thorough assessments due to their geographical location.

Measures to prevent and manage the risk include:

- Further investigations of suppliers shared across the group are being conducted in line with our due diligence routines.

3.2.5 REDGO Norway AS

Industry risk – vehicle recovery and roadside assistance: The vehicle recovery and roadside assistance industry shares many characteristics with the transport sector and can be associated with a higher risk of violations of decent working conditions. This is due to various risk factors that characterize the industry, such as atypical forms of employment and a vulnerable workforce that is easily



replaceable and/or low-skilled. Furthermore, working conditions may be hazardous, with a risk of accidents, and the physical working environment may be characterized by stress and inadequate health, safety, and environment (HSE) conditions. (Source: Responsible Sourcing Tool). This risk area is relevant for the REDGO companies, which are affiliated with a number of suppliers that provide roadside assistance and vehicle recovery services as part of the franchise network.

At the end of 2025, a serious workplace accident occurred at one of REDGO's suppliers in connection with a vehicle recovery assignment that had been facilitated by the REDGO customer service center. The accident resulted in the death of an employee of the supplier. The cause has not been determined, as the case is under investigation by the Police and the Labour Inspection Authority.

Measures to prevent and manage the risk include:

- Follow up to ensure that the supplier self-declaration has been signed
- Review of safety requirements in contracts with subcontractors
- Review of HSE (Health, Safety, and Environment) regulations
- Dialogue within the Network Cooperation Committee to increase focus and knowledge regarding HSE risks and procedures among suppliers
- Further analysis of our supplier database within the industry will also be carried out
- More thorough investigations will be conducted for a selected group of suppliers within the industry, in accordance with our due diligence procedures.

Product risk – cars and vehicles: The production of cars and components for vehicle repair is part of the supply chain for the automotive and workshop industry and is associated with high product risk. The production of cars and vehicles, batteries, and tires is included on DFØ's high-risk list. Car manufacturing primarily involves a risk of human rights violations in the production of components and the extraction of raw materials. (Source: DFØ High-Risk List). This risk area is relevant for suppliers to the REDGO companies.

Measures to prevent and manage the risk include:

- Additional investigations of the supply chain are ongoing in accordance with our due diligence procedures.

3.2.6 Flyt AS

Product risk – AutoPASS tags: The production of ICT products, such as AutoPASS tags, is associated with a high risk of violations of workers' rights and fundamental human rights. This applies particularly to raw material production, but also to component manufacturing and final assembly. (Source: DFØ High-Risk List). This risk area is relevant for Flyt.

Measures to prevent and manage the risk include:

- Additional investigations of the supply chain are ongoing in accordance with our due diligence procedures.

4. Results of our supplier follow-up in 2025

- 95 percent of the Group's payments are made to suppliers that have signed the Supplier Code of Conduct and are therefore committed to complying with the principles of the UN Global Compact.
- In 2025, we followed up a total of 146 of the Group's largest suppliers through the EcoVadis platform. All suppliers receive feedback on areas for improvement through dialogue with our procurement managers or directly from EcoVadis. In 2024, we implemented a reporting solution that enables us to continuously maintain an overview of which suppliers we have agreements with within the risk areas highlighted in our overarching due diligence assessments.
- The selected suppliers are subject to more thorough investigations, which was a key focus of the work in 2025. The status of the implementation of these in-depth investigations as of year-end is presented in the table below.
- The methodology for conducting more thorough investigations is based on the approach used for our double materiality analysis (CSRD topic S2 – Workers in the value chain).
- In addition, we carried out an on-site supplier audit of a group-wide supplier in India in 2025.



As part of the work, additional information has been obtained about the suppliers, including through questionnaires, review of EcoVadis results, and other available information. No actual adverse impacts have been identified.

	GF ASA	GPF AS	GMG AS	REDGO Norge AS	Flyt AS
Number of suppliers to be checked	36	22	7	5	3
Number of conducted supplier checks	31	20	3	2	2



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5. Investments

Gjensidige uses external asset managers to carry out parts of its investment management. Reduced international support for efforts related to diversity, climate, and human rights makes it more challenging to identify competent managers who comply with our ESG requirements. We are also dependent on research and analysis providers that assess, among other things, whether companies contribute to human rights violations in occupied territories. Several such analysis providers are now discontinuing these assessments, in line with political positions in the United States. At the same time, the work of the Norwegian

Ethics Council to recommend new exclusions has been put on hold in order to assess new guidelines for its future activities. This may result in an increased risk of human rights and labor rights violations within the investment portfolio.

Measures to prevent and manage the risk include:

- We are working to apply alternative information sources in our exclusion processes.
- In 2025, we conducted dialogue with seven asset managers concerning 14 distinct companies.

Overview of exclusions per cause. Companies may be excluded for more than one reason.

	Exclusions by cause from our investment portfolios							
	Number unique companies	Number exclusions	Labour conditions	Corruption	Human rights	Severe environmental damage	Controversial weapons	Sovereign bonds
Number of companies Q4-2024	167	176	5	11	89	30	37	4
Number of companies Q4-2025	169	179	5	9	94	32	35	4
Change through the year	2	3	0	-2	5	2	-2	0

6. Going forward

We continuously work to improve our systems and procedures for monitoring suppliers' management of human and workers' rights, as well as environmental impact. We also seek cooperation with other companies in order to help strengthen our shared responsibility for workers' and human rights, and to identify increasingly effective measures and tools for detecting and remedying violations.

In 2026, we will further develop our procedures and measures. This will include continued efforts to integrate the follow-up of selected suppliers into existing supplier management and incident reporting processes, ensuring that these suppliers are monitored on a regular basis. We will also carry out more thorough investigations of the

remaining suppliers with elevated risk. In addition, we will consider further analysis of selected areas.

In 2026, we will also implement a new system for supplier registration and screening of our supplier base. The new system will improve the overall mapping of risks in the supplier portfolio and strengthen our ability to identify incidents, collect information about suppliers, and implement mitigating measures.



Approved by the Board of Directors and the CEO of Gjensidige Forsikring ASA (Please see the Norwegian version for the related signatures).

