

# 2022

Statement on management of  
human rights and  
decent working conditions

# BEWI





# Contents

<b>Introduction</b>	<b>3</b>
About this report	3
Introduction	3
About the BEWI Group	4
About the Subsidiaries	5
<b>Management of human rights and working conditions</b>	<b>6</b>
Policies	7
Channel to report	8
Education, training, and awareness	8
Due diligence	8
Annual salient human rights mapping	9
Digital supply chain management system: BEWI Partner	9
Supplier audits	9
<b>Findings from assessment</b>	<b>10</b>
Results from BEWI ASA's 2022 assessment	11
Results from Subsidiaries	11
<b>Measures implemented &amp; planned</b>	<b>12</b>
Implemented measures addressing and managing identified risk	12
Planned assessments based on identified and prioritized risks	13

# Statement on management of human rights and decent working conditions 2022 for BEWI ASA and relevant entities

## ABOUT THIS REPORT

This report covers BEWI ASA's and its relevant subsidiaries' legally required disclosures under the Norwegian Transparency Act (the "Act") for 2022. BEWI ASA (the "Company") and its subsidiaries which are required to report under the Act are covered in this statement. The subsidiaries of the Company legally required to report under the Act are Jackson AS, BEWI Building & Industry AS, BEWI Food AS, BEWI Norplasta AS, Trondheim Eskefabrikk AS and BEWI EPS Norway AS (the "Subsidiaries"). The Company and the Subsidiaries are together referred to as "BEWI". The Company and all its majority owned subsidiaries are together referred to as the "BEWI Group".

## INTRODUCTION

The Act came into effect on 1 July 2022. The purpose of the Act is to promote businesses' respect for basic human rights and decent working conditions and to ensure the public access to information.

The Act imposes a duty to conduct a due diligence assessment on human rights and working conditions. The assessment must be made available on the company's website and must be carried out regularly.

The Company publishes an annual report on its ESG performance, covering the BEWI Group's material topics based on an annual double materiality assessment in accordance with GRI Standards (2021). The assessment performed in 2022 was also conducted in accordance with the proposed European Sustainability Reporting Standard (ESRS), and resulted in eight material topics, of which "Working conditions", "Human rights" and "Ethical business conduct" were three of the topics. For each material topic, the Company reports on its efforts and progress for the relevant year, as well as key risks and opportunities, key targets, and key priorities going forward.

Topics related to working conditions and human rights are included from page 49 of the Company's annual report for 2022, available at [bewi.com](https://bewi.com)



# About the BEWI Group

The BEWI Group is a leading provider of packaging, components, and insulation solutions, with a vision of: *Protecting people and goods for a better every day*. The Company is listed on the Euronext Oslo Børs, and the BEWI Group has operating facilities in 14 European countries.

The BEWI Group is integrated throughout its value chain, from production of raw materials and end goods to collection and recycling, and has four reporting segments: RAW, Insulation & Construction ("I&C"), Packaging & Components ("P&C") and Circular.

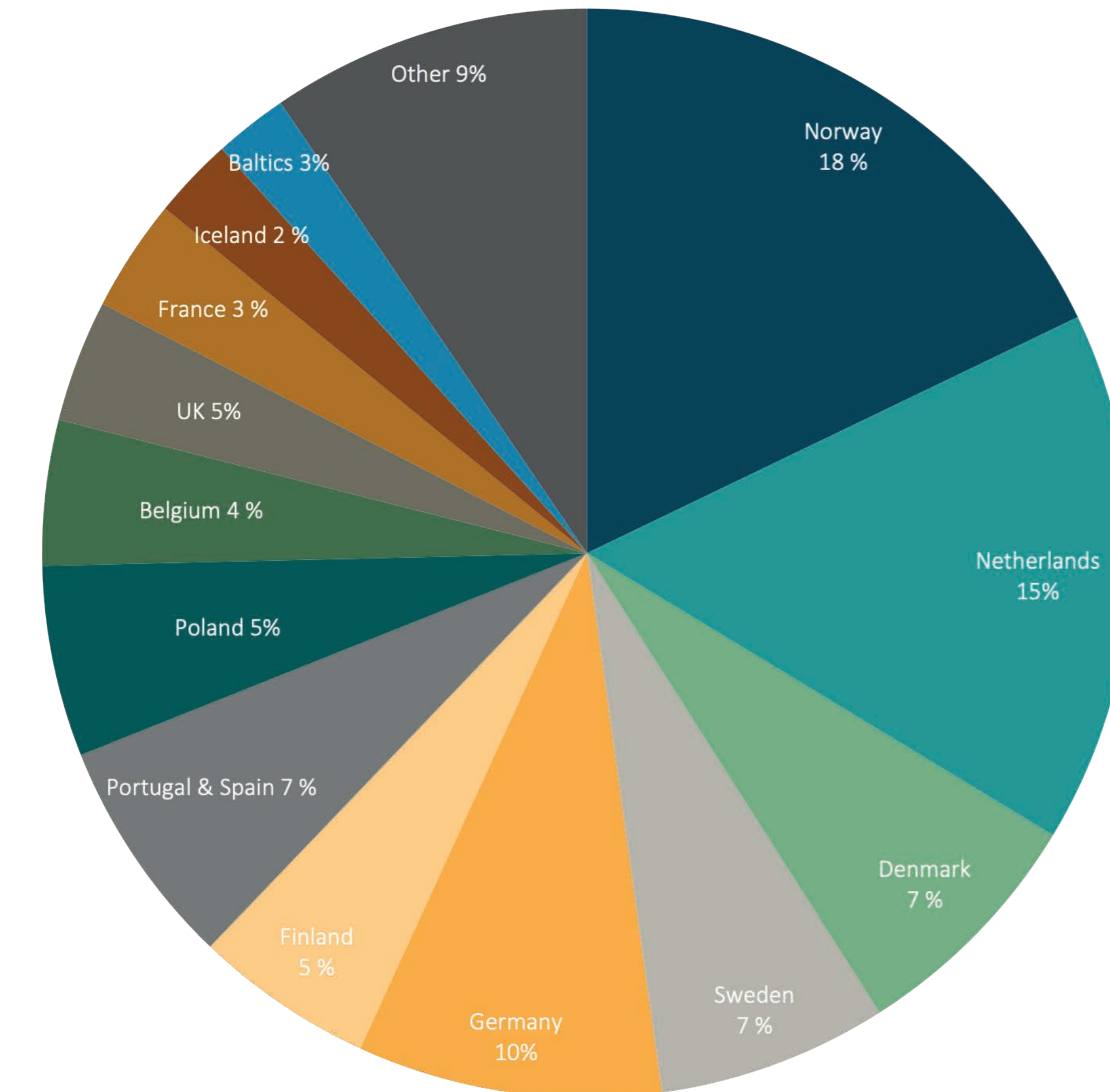
**RAW** develops and produces raw material. The raw material is sold internally, to the two downstream segments I&C and P&C, and to external customers. Production of the raw material is conducted at three facilities located in Porvoo in Finland, in Etten-Leur in the Netherlands and in Wismar in Germany.

**Insulation & Construction** develops and manufactures an extensive range of insulating solutions and systems for the building and construction industry, as well as for infrastructure projects. The BEWI Group produces insulation solutions at 39 facilities in 12 European countries.

**Packaging & Components** develops and manufactures standard and customised packaging solutions, as well as technical and automotive components for customers in several industrial sectors. The production of such solutions is conducted at 35 facilities in nine European countries. In addition, P&C sells traded products, mainly related to food packaging.

**Circular** is responsible for the BEWI Group's collection and recycling of used material, aiming at making the BEWI Group a fully circular group. Circular offers different solutions for waste management and collection of used material, as well as a range of recycled materials. Circular has seven facilities in four European countries.

## Markets



The BEWI Group has a total of 67 production facilities. Several of the facilities produce both packaging and insulation solutions. In addition, the BEWI Group has 13 jointly owned facilities in Europe, and operates a trading office in Canada. 95 per cent of the BEWI Group's suppliers<sup>1</sup> are based in the Northern and Western Europe where human and labour rights regulations are considered strong.

At the end of 2022, the BEWI Group had approximately 3 300 employees. Ensuring safe working conditions for the employees and creating a culture where employees can grow and reach their full potential is a priority for the Company.

<sup>1</sup> Registered in the BEWI Group's internal digital supply chain management system, BEWI Partner, in 2022



# About the Subsidiaries

## BEWI Building & Industry AS

About: A Norwegian company developing and selling insulation solutions mainly to Norwegian companies. The solutions are manufactured at three production facilities in Norway.

At the end of 2022, BEWI Building & Industry AS had 282 suppliers, located mostly in Scandinavia, as well as in the Northern and Western Europe.

## Jackon AS

About: A Norwegian company developing and selling insulation solutions manufactured at six production facilities in Norway. The company's main market is Norway, but the products are also sold to UK, Sweden, Denmark, and Finland. Jackon was acquired by the Company in October 2022, and consolidated into the BEWI Group as of 1 November 2022.

At the end of 2022, Jackon AS had 290 suppliers, located mostly in Scandinavia, as well as in the Northern and Western Europe. Raw material is purchased/ sourced mainly from BEWI Group's own RAW segment, whereas most of the volume is imported from Germany and the remaining from Finland.

## BEWI EPS Norway AS

About: A Norwegian company developing and selling mainly packaging products to Norwegian seafood industry. The products are manufactured at four production facilities in Norway.

At the end of 2022, BEWI EPS Norway AS had 486 suppliers. Raw material is purchased/ sourced mainly from BEWI Group's own raw material production, out of which the majority of the volume is imported from Finland and the remaining from Germany.

## BEWI Norplasta AS

About: A Norwegian company developing and selling injection molding products for a wide range of customers. The products are manufactured at one facility at Stjørdal in Norway. The company's main market is Norway, and the products are also sold to other Nordic countries.

At the end of 2022, BEWI Norplasta AS had 50 suppliers, located mostly in Scandinavia, but also some in Asia.

## BEWI Food AS

About: A Norwegian company selling traded packaging solutions, mainly to the food/ seafood industry, as well as antioxidants, absorbents, packaging machines and strapping machines. The company does not manufacture own products, and the sales personnel is located along the coast of Norway to be close to customers. The company's main market is Norway, and the products are also sold to other Nordic countries.

At the end of 2022, BEWI Food AS had 131 suppliers, mainly located in Europe and Asia.

## Trondhjems Eskefabrikk AS

About: A Norwegian paper packaging company developing and selling packaging from fiber and cardboard. The products are manufactured at one facility in Trondheim. The company's main markets are Norway and Sweden. In addition, some products are exported to Iceland. Trondhjems Eskefabrikk was acquired by BEWI Group in April 2022.

At the end of 2022, Trondhjems Eskefabrikk AS had 61 suppliers. Most of the raw material is purchased from Sweden, amounting to approximately 85 per cent, while the remainder is purchased from the Netherlands. In total, the company had five suppliers of raw material, of which four are based in Sweden.

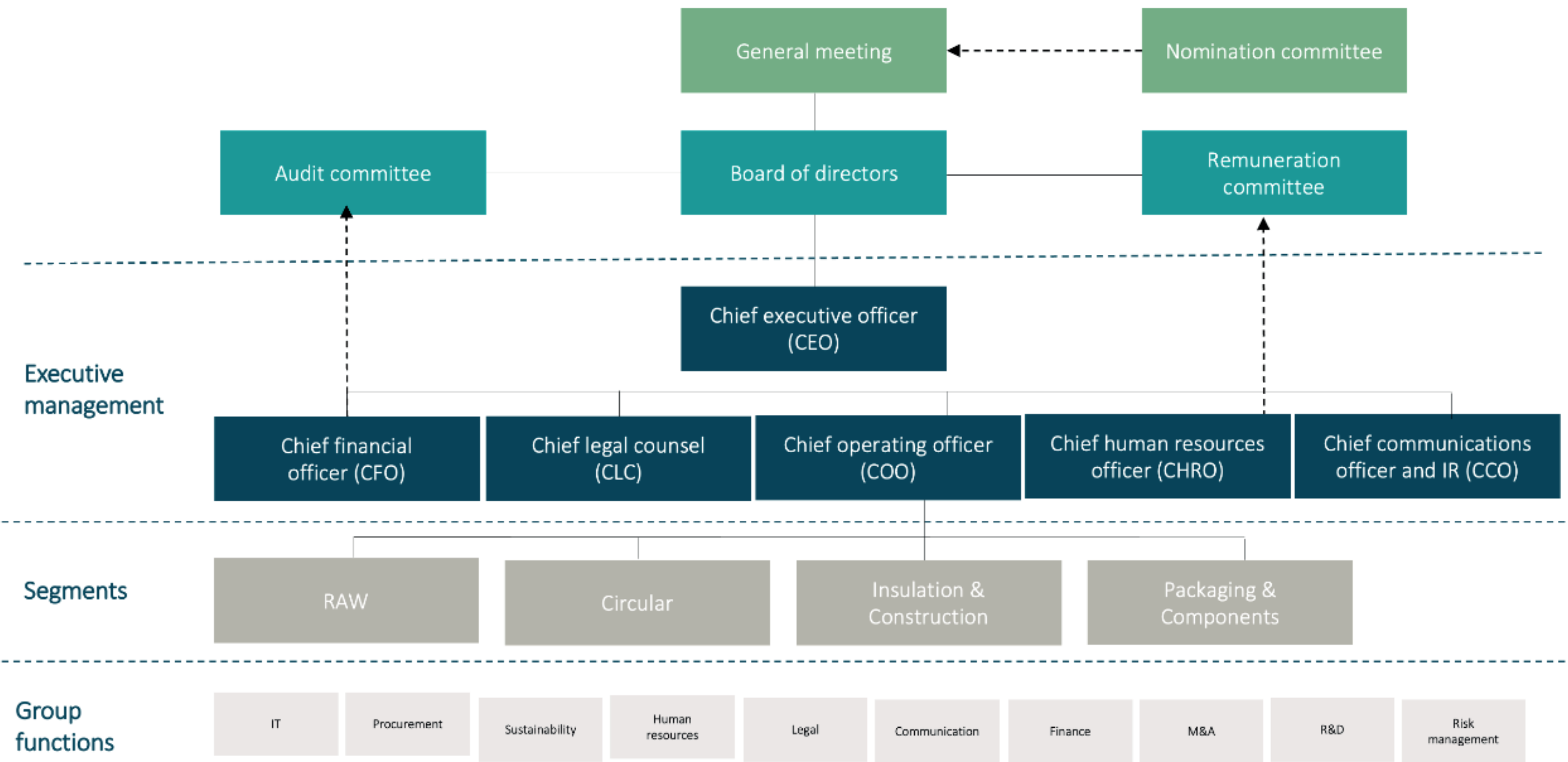


# MANAGEMENT OF HUMAN RIGHTS AND WORKING CONDITIONS

BEWI Group believes that business can prosper in societies where human rights<sup>2</sup> are protected and respected. The BEWI Group is committed to respect human rights and acknowledges its responsibility to contribute to positive impacts on human rights. Working conditions and human rights are identified as two of the the BEWI Group’s material topics.

BEWI ASA’s board of directors has approved policies related to human rights and working conditions. The policies are reviewed by the board once a year and are available on the Company’s website, bewi.com

### Relevant corporate bodies in BEWI



The Company’s **board of directors** (“the Board”) has the highest authority to oversee the work with environment, social and governance (“ESG”) matters. An audit committee, appointed by the Board, supervises the Company’s annual and quarterly reporting, including both financial and non-financial numbers, as well as the internal control system.

The **executive management team** is accountable for BEWI Group’s work with ESG and approves the annual materiality assessment activities, assigns accountability for ESG activities at executive level, proposes the ESG targets as part of the corporate strategy to the Board and monitors progress towards the targets.

The **Director of Sustainability** together with the **Chief Human Resource Officer** (CHRO) and the **Chief Legal Officer** (CLO) are responsible for the management of ESG, where the Director of Sustainability is responsible for the daily coordination across the BEWI Group.

**Group functions** are responsible for ensuring compliance and to integrate ESG requirements within their area of responsibility, including guidelines and tools, as well as following up on progress towards the BEWI Group’s commitments.

**Managing directors** for divisions and business units have the overall responsibility to ensure compliance with the BEWI Group’s policies, programs and targets.

All the Subsidiaries operate under the same laws and regulations as the Company, including the same governing documents related to human rights and decent working conditions. The Subsidiaries report under BEWI Group’s Norwegian business units. Deviations, if any, are explained specifically.

<sup>2</sup>Rights inherent to all human beings, regardless of race, gender identity, sexual orientation, nationality, ethnicity, disability, language, religion, or any other status.



## **Policies**

The policies adopted by the Board governing human rights and decent working conditions (the “Policies”) are:

- the Code of Conduct
- the Supplier Code of Conduct
- the Anti-corruption policy
- the Privacy statement

The Policies applies to all employees, Board members and consultants of all companies within the BEWI Group and to any other person, partner or company acting on behalf of any company within the BEWI Group.

In addition to the Policies, the BEWI Group has adopted internal policies, guidelines, and procedures, such as for example a human resource policy and a gift and event policy.

### **The Code of Conduct**

The Code of Conduct is designed to guide all employees in their daily activities to ensure that each employee act as a good corporate citizen and a respectful business partner. The Code of Conduct is based on, among other principles, the UN Global Compact’s ten principles on fundamental responsibilities in the areas of human rights, labour, environment, and anti-corruption. The Company is a member of the UN Global Compact and publish an annual Communication on Progress (CoP) report to demonstrate its corporate sustainability through embedding the ten principles into its business.

The BEWI Group’s commitment to human rights is set out in the Company’s Code of Conduct, outlining how the companies within the BEWI group shall comply with local, national and international standards of human rights.

The Code of Conduct also sets out BEWI Group’s commitments to ensure its workers wellbeing and development. The policy stipulates employees’ rights to form or join a trade union as well as that it shall provide equal opportunities irrespective of race, ethnical background, religion, nationality, gender, marital status, age, or sexual orientation. Everyone working for the BEWI Group, in particular those in a management position, has a responsibility in their daily work to ensure compliance with these commitments.

### **The Supplier Code of Conduct**

The Supplier Code of Conduct was developed and implemented in 2022 and includes the BEWI Group’s expectations to its suppliers with respect to business ethics and internationally recognised labour- and environment requirements, including the OECD Due Diligence guidelines for responsible business conduct.

Suppliers are asked to confirm its compliance with the Supplier Code of Conduct. The suppliers shall, in accordance with OECD guidelines, carry out actions to identify, prevent, mitigate, and account for how they address actual and potential adverse impacts in their operations, supply chain and subcontractors. If non-compliances occur, it is expected that corrective actions are taken within a reasonable timeframe agreed upon between the supplier and the Company. Identified risks must be mitigated and the BEWI Group expects full transparency and dialogue in the process.

### **The Anti-Corruption Policy**

The Anti-Corruption Policy shall ensure effective and fair competition and describes BEWI’s zero tolerance to bribery and corruption.

### **The Privacy Statement**

The Privacy Statemen shall ensure compliance with the requirements of the General Data Protection Regulation (“GDPR”), outlining how the BEWI Group collects, uses, stores, and protects personal data of individuals.



### Channel to report

BEWI Group's whistleblowing service facilitates the reporting of serious improprieties concerning potential compliance issues related to laws, regulations, and own policies. The channel is available to all stakeholders through internal channels and via the Company's website. The function is operated by an independent third party, notifications may be done anonymously, and all reports are handled with confidentiality

### Education, training, and awareness

To increase awareness of, and ensure compliance with policies and the management approach, courses are held throughout BEWI Group's organisation. Managers within sustainability, procurement, and human resources conduct monthly meetings to share experience, and to discuss common opportunities and challenges. An annual ESG seminar is organised to raise awareness of BEWI Group's commitment, progress, and results and to discuss and share experiences.

BEWI Group has compliance programmes, addressing topics such as human rights, health and safety, anti-corruption, competition law, and IT security.

### Due diligence

The BEWI Group is committed to respect human rights, carry out due diligence, and provide remedy if things go wrong in its operations, supply chain or with its business partners. Human rights due diligence is the process where the BEWI Group maps out when, where, and how it impacts human rights. Thereafter, a prioritisation of identified impacts and implementation actions are conducted. The assessments are carried out in accordance with OECD Guidelines for Multinational Enterprises and the Norwegian Transparency Act, both covered in the BEWI Group's digital supply chain management system called BEWI Partner.





## Annual salient human rights mapping

A salient human rights mapping was conducted in 2022, with the aim to identify and prioritise the management of human right issues. Based on the result from the mapping the Company will develop an action plan for each salient issue to guide how the BEWI Group will manage and monitor each issue going forward.

The mapping resulted in the following key salient human rights issues in BEWI Group's value chain:

1. Working conditions: logistics, tier 2-3 suppliers
2. Hazardous materials: own operations and supply chain
3. Health and safety: own operations and supply chain
4. Forced labour: logistics and supply chain
5. Discrimination: own operations
6. Corruption and unethical behaviour: own operations and supply chain

BEWI Group has identified chemical and logistic suppliers, as well as the Asian region as the areas of highest concern. These will be a primary focus for 2023.

## Digital supply chain management system: BEWI Partner

The BEWI Group's suppliers are screened and assessed in BEWI Partner, a digital supply chain management system aligned with the Company's Supplier Code of Conduct, and its procurement management approach and guidelines. The platform, launched in 2021, shall ensure that suppliers meet BEWI Group's expectations and requirements, and enable the BEWI Group to document and risk assess the suppliers' performance.

The platform includes a self-assessment questionnaire (SAQ), where suppliers respond to the Company's questions and upload relevant documentation. Thereafter, a risk assessment of the supplier is made based on the following topics:

1. Health & safety
2. Environment
3. Corporate governance (including anti-corruption) & human rights
4. Quality & performance
5. Information security

The self-assessment questionnaire will be expanded in 2023, to include more details related to human rights. Each business unit in the BEWI Group will monthly report the number of suppliers screened in the system, including the number of suppliers not meeting the Company's minimum requirements.

## Supplier audits

It is mandatory for the Company's procurement team to conduct audits when visiting suppliers using a Visual Observation Form as an assessment tool during factory visits (covering health and safety, environment, and labour conditions). This is an internal audit form used along with photos taken at the site to develop a Corrective Action Plan (CAP) if needed. The CAP must be completed in cooperation with the supplier before end of visit, including due dates for issues addressed and signed by both parties. Procurement is responsible for following up the CAP until closed.



# FINDINGS FROM ASSESSMENT

The BEWI Group has approximately 7 500 suppliers, of which the majority is based in Europe and approximately 1 per cent in Asia. Today, 10 per cent of the suppliers account for 90 per cent of the purchasing volume in euro. The Company will work to reduce the number of suppliers to increase control of human rights risks related to their operations. A salient human rights mapping was conducted in 2022, with the aim to identify and prioritise the management of human right issues. Based on the result, key risks were identified in the BEWI Group's own operations and in its supply chain.

## 1. Human rights

All facilities within the BEWI Group are in Europe and approximately 95 per cent of the suppliers<sup>3</sup> are based in Northern and Western Europe where human and labour rights are considered strong. Further mapping of our value chain is, however, essential. The main risks identified in our value chain related to human rights are:

- Lack of transparency in tier 2 and 3 suppliers
- Labour and working conditions

## 2. Health & safety

The well-being, worth, and overall quality of life for the people in our value chain is important for the BEWI Group. Ensuring safe working conditions is paramount in the BEWI Group and the Company has a target of zero accidents. The main risks identified in our value chain related to health and safety are:

- Loss of awareness of risks in daily work, impacting the safety culture
- Handling of hazardous material in chemical manufacturing plants

## 3. Employees wellbeing

For the BEWI Group it is a key aspect of creating a positive work environment and promoting employee satisfaction, engagement and productivity. The Company shall create a learning environment which recognizes the contribution of colleagues and provides development opportunities. The main risks identified related to employee's wellbeing are:

- Talent shortage in key markets
- Employee turnover





## Results from the Company's 2022 assessment

In 2022, the BEWI Group increased the awareness of its suppliers' performance on environmental, social, governance and human rights topics. The Company is committed to respect and promote all internationally recognized human rights in its own operations and in its value chain.

A total of 220 suppliers, representing 3 per cent of the total suppliers, were assessed during 2022 for ESG criteria's including human rights impacts in BEWI Partner, whereas

- 65% procurement spend assessed for ESG criteria in BEWI Partner
- 54% SAQs received were from new suppliers

Of the suppliers assessed in BEWI Partner,

- 2.7% identified as having potential negative social impacts<sup>3</sup>
- 13% identified as having potential negative environmental impacts<sup>4</sup>
- 12 suppliers identified as potentially high risk due geographical location (Asia), of which
  - 6 suppliers visited with onsite audits and approved
  - 4 suppliers approved through the Company's assessment platform BEWI Partner
  - 2 suppliers will be assessed in 2023

## Results from Subsidiaries' 2022 assessment

**BEWI Building & Industry AS:** 1% of suppliers risk assessed, out of which one supplier was rejected due to lack of documentation

**BEWI EPS Norway AS:** 19% of suppliers risk assessed – no breaches discovered

**BEWI Norplasta AS:** 6% of suppliers risk assessed – no breaches discovered

**BEWI Food AS:** 23% of suppliers risk assessed – no breaches discovered

**Trondhjems Eskefabrikk AS:** no suppliers assessed

**Jackon AS** started to map out and prioritize its supply chain in 2022. A desktop due diligence assessment was performed on 16 per cent of the suppliers with a spend of more than EUR 10 000. In this process, Jackon AS chose to discontinue collaboration with one supplier due to the refusal of employees joining trade unions.

<sup>4</sup> Due to failure to document policies and procedures. Among the identified suppliers, no improvements were agreed, and no relationships were terminated



# MEASURES IMPLEMENTED & PLANNED

The BEWI Group's approach to address identified risks and mitigate potential negative impact, are to implement measures designed to reduce the likelihood of risks occurring or minimise the severity of the consequences if they do occur:

## Implemented measures addressing and managing identified risk:

- Salient human rights mapping
- Implementation of BEWI Partner
- Evaluation of policies and management approach
- Courses and training of employees





### **Planned assessments based on identified and prioritized risks:**

#### **Own operations:**

- Implementation of new health & safety policy and management approach
- Training of employees
- Awareness and shared learnings
- Further development of leadership programmes to increase knowledge
- Attract a diverse workforce
- Secure internal career opportunities
- Ensure development plans for employees
- Ensure a healthy gender mix in key positions
- Continuously work to ensure safe working conditions
- Secure ISO 9001 certification of all facilities

#### **Supply chain:**

- Desktop analysis with focus on Asia, chemical suppliers, and logistics
- Strengthen due diligence/ assessments
- Risk assessment in BEWI Partner past tier 1
- Secure transparency in supply chain
- Reduce number of suppliers
- Supplier visits using Visual Observation Form
- Corrective Action Plan developed if needed

All companies within the BEWI Group are required to report under the Act shall follow the Company's priorities and routines with strong focus on awareness, integration and training to integrate policies and management approaches into the organisation.



Trondheim, Norway  
June, 2023

Dated on the date set out in connection with electronic signatures

The board of directors and CEO  
**BEWI ASA**

Gunnar Syvertsen  
*Chair of the board*

Anne-Lise Aukner  
*Director*

Rik Dobbelaere  
*Director*

Andreas M. Akselsen  
*Director*

Kristina Schauman  
*Director*

Pernille Skarstein Christensen  
*Director*

Christian Bekken  
*CEO*



Trondheim, Norway  
June, 2023  
Dated on the date set out in connection with electronic signatures  
  
The board of directors and Managing Directors of the Subsidiaries

**Trondhjems Eskefabrikk AS**

Stein Inge Liasjø <i>Chair of the board</i>	Christian Bekken <i>Director</i>
Rune Kvilvang <i>Director and Managing Director</i>	

**BEWI Building & Industry AS**

Stein Inge Liasjø <i>Chair of the board</i>	Christian Bekken <i>Director</i>
Rune Kvilvang <i>Director</i>	Jens Christian Hernes <i>Managing Director</i>

**BEWI EPS Norway AS**

Stein Inge Liasjø <i>Chair of the board</i>	Christian Bekken <i>Director</i>
Rune Kvilvang <i>Director and Managing Director</i>	

**BEWI Norplasta AS**

Stein Inge Liasjø <i>Chair of the board</i>	Rune Kvilvang <i>Director</i>
Morten Furunes <i>Managing Director</i>	

**Jackon AS**

Christian Bekken <i>Chair of the board</i>	Nina Berger Nossen <i>Director</i>
Marie Danielsson <i>Director</i>	Ole Freddy Ek <i>Director</i>
Torben Nielsen <i>Director and Managing Director</i>	

**BEWI Food AS**

Stein Inge Liasjø <i>Chair of the board</i>	Christian Bekken <i>Director</i>
Rune Kvilvang <i>Director and Managing Director</i>	



**BEWI**  
*for a better everyday*