

# Gonvarri Material Handling AS



**Gonvarri**  
Material Handling

## The due diligence report in accordance with the Transparency Act

### The Group

Gonvarri Material Handling Group "GMH" manufacture innovative, cutting-edge storage solutions through our global network. Gonvarri Material Handling Group comprises of the Constructor, Kasten, Dexion, Stålteknik and Kredit brands and is one of Europe's leading engineering and manufacturers of storage solutions.

We have a strong and rich history with centuries of combined knowledge, allowing customers access to a global network of storage expertise and experience. With coverage across much of the globe, the Group has helped some of the worlds' leading brands and pioneering SME's. It aims to support customers and partners with storage planning, installation and ongoing service and support.

Gonvarri Material Handling AS is the Norwegian Holding company of the Group and holds operations across large parts of Europe, including factories in Germany, Romania, Czech Republic and Sweden, as well as sales companies in several European countries and also Colombia, USA and Canada.

The company is owned by the Spanish Group Gonvarri Industries, which is a leading company in the market of flat steel and aluminium processing. With more than 67 years of experience, the group has 8,138 employees in 27 countries and 56 factories. Gonvarri Industries has a strong focus on sustainability, including human rights and decent working conditions.

Constructor Norge AS is the Norwegian subsidiary of Gonvarri Material Handling AS and where the operational activity takes place within Norway. The company is also publishing a separate due diligence report based on the transparency act on its webpages. This report for Gonvarri Material Handling AS is also including the findings in the subsidiary.

### Introduction

The Transparency Act came into force on 1 July 2022 and was adopted to promote companies' respect for basic human rights and decent working conditions. Gonvarri Material Handling AS is committed to safeguard fundamental human rights and decent working conditions, both in our own business, our supply chain and our business partners. We work actively to implement this in our daily business.

Together with our owners, the company continuously maps and assess risks related to our business through due diligence assessments. The responsibility is also anchored in the business through board decisions.

Constructor Norge AS has established a routine for following up on the Transparency Act, which describes the process so that all employees are involved in following up on the due diligence assessments. The company is ISO certified and therefore conducts ongoing supplier

*Handwritten signature*

# Gonvarri Material Handling AS



**Gonvarri**  
Material Handling

assessments as part of this certification. They have membership in Startbank, a qualification scheme for companies within the building and construction industry.

As part of Gonvarri Industries, we are included in the extensive work our owners conduct related to sustainability and social responsibility. On their website, they have published a comprehensive sustainability report which also includes decent working conditions, as well as the Human Rights Gonvarri Corporate Policy, <https://www.gonvarri.com/en/sustainability/>. On the website of the company there is an ethical channel with the objective to provide a secure and confidential platform for employees, stakeholders, and other individuals to report unethical behaviour, misconduct, or violations of company policies. This channel aims to foster the Gonvarri culture of transparency and accountability, ensuring that all concerns are addressed promptly and fairly. By encouraging open communication and protecting whistleblowers from retaliation, the ethical channel helps maintain the integrity of the organization and promotes a safe and respectful work environment.

The Norway subsidiary identifies and handles human rights risks on its own, leveraging group policies for support but without over-reliance.

## Mapping

All Group units throughout Europe are subject to internal control and follow-up, we are basing our activity on the Gonvarri Industries' sustainability report and human rights principles. Risk is therefore considered to be low. The Norwegian entity is purchasing the main portion of its supply from other Group units.

The company's third-party approval process includes the formal acceptance of the Supplier Code of Ethics, ensuring commitments to human rights and decent working conditions. Installation service providers are required to submit specific documentation before starting their activities, while transportation service providers are not yet providing specific documentation.

Additionally, third parties must provide accrediting documentation before performing high-risk activities. The company has identified risks related to human rights and poor working conditions within its supply chain and has implemented measures to address them. These measures include service agreements, a code of conduct, and compliance with ISO 9001 and ISO 14001 standards.

In Norway, some of our products are delivered from external manufacturers within EU. We also use external assembly companies and transporters which are using foreign labour. In Norway we mostly interact with Norwegian companies (NUF company or Norwegian VAT registered). These are considered to have a lower risk, but we are still aware that breaches can occur. We implement various measures to ensure that risk is as low as possible.

We follow a risk-based mapping by focusing on moderate-risk areas such as foreign labour in assembly companies and transporters.

GMH has incorporated a new tool to assess their supply chain human rights risk. The EcoVadis tool is used to assess the supply chain's performance in human rights practices. It

# Gonvarri Material Handling AS



**Gonvarri**  
Material Handling

provides a comprehensive evaluation by analysing various criteria such as labour practices, health and safety, and ethical conduct. Through detailed questionnaires and evidence-based assessments, the tool helps GMH to identify risks and areas for improvement, ensuring that suppliers adhere to international human rights standards. This evaluation promotes transparency and accountability, fostering a responsible and sustainable supply chain in GMH. Gonvarri Industries has participated in EcoVadis for the third consecutive year, and in 2025 was awarded the gold medal, placing it in the top 5% globally.

## Measures

Efforts are being made to ensure that all contracts with our external suppliers include paragraphs dealing with respect for basic human rights and decent working conditions. This also includes suppliers' approval of our "code of conduct" and supplier assessment, PVA (Preferred Vendor Assessment) on an annual basis. These have been prepared by Gonvarri Industries and apply to all the group's units.

In 2025, the following corporate compliance policies have been reviewed and updated by Gonvarri Industries:

- Equality, Diversity and Inclusion Policy.
- Corporate Policy on Conflict Minerals
- Commercial Sanctions Policy
- Harassment Prevention Protocol
- Protocol on Relations with Public Authorities
- Logistics Protocol relating to due diligence activities
- Procedure for the Management of Social Initiatives, Donations and Sponsorships

It is expected that all our subcontractors and other partners work persistently and systematically to comply with sustainable business.

## Results

As of today, we consider the company to be a relatively safe company with no major risk of violations of basic human rights or decent working conditions. Mapping and risk classification have not identified actual negative consequences or a significant risk of negative impact on human rights or decent working conditions through the overall risk assessment. We will nevertheless prioritize the areas with a moderate risk, such as the use of assembly companies and transporters.

Gonvarri Material Handling AS and Constructor Norge AS will continue to have a strong focus on responsible business. The experience we gain from working with risk assessments is used to improve our processes and results in the future. Legislation similar to the Norwegian Transparency Act will gradually come into force for several European countries, which also means an increased spotlight on risk assessments within the whole of Gonvarri Industries.

# Gonvarri Material Handling AS



**Gonvarri**  
Material Handling

Oslo, June 30. 2026

## Board of Directors in Gonvarri Material Handling AS

Juan Maria Riberas Mera  
*Chairman*

Jesus Calvo Moreira  
*General Manager /  
Board member*

DocuSigned by:

*Catherine Andersson*

BDC5A8DDF61F4BB...

Catherine Andersson  
*Board member*