

Mecwide Nordics AS Norwegian Transparency Act



MECWIDE
NORDICS

Introduction

This statement is made pursuant to the Norwegian Transparency Act of 2024 (the “Act”), which requires in-scope companies to carry out due diligence and publish an account of that due diligence in accordance with Section 5 of the Act. This statement is prepared on behalf of Mecwide Nordics AS and outlines Mecwide’s processes for managing actual and potential adverse impacts on fundamental human rights and decent working conditions. All data and information reported in this statement refer to the financial year ending on December 31, 2023, unless otherwise indicated.

About MECWIDE NORDICS AS

Mecwide S.A. is the parent company of Mecwide Nordics AS.

Mecwide S.A. is a Portuguese company that focuses on EPC (Engineering, Procurement, Construction) projects worldwide. Mecwide Nordics AS, a company incorporated under Norwegian law, provides these services with a focus on data centers’. The Mecwide Group, which includes Mecwide Nordics AS, employs about 1,000 employees in more than 10 countries. In Norway, Mecwide Nordics employs approximately 200 employees across its offices and construction sites. Our core business activities primarily involve specialized activities such as detailed engineering, procurement of piping and equipment (valves, heat exchangers, inertia tanks, pumps, deaerators, flow meters, instruments) for cooling networks, and procurement of piping and equipment for fire protection networks, installation of piping and supports, and testing and flushing of lines in data centers. We are committed to respecting and promoting internationally recognized human rights, including those enshrined in the Universal Declaration of

Human Rights and the International Labour Organization's core conventions on fundamental principles and rights at work.

Guidelines and Procedures

Mecwide Nordics adheres to the same core policies, standards, and procedures as its parent, Mecwide S.A., which uphold the Company's commitment to respect internationally recognized human rights and decent working conditions.

Policies and Management System

Mecwide Nordics AS has implemented a sustainability policy that encompasses Corporate Social Responsibility (CSR) practices. This policy is publicly accessible and can be found on the official Mecwide website at [Mecwide's Sustainability Policy](#). The sustainability policy is governed through the CEG Quality Management System, and the Head of Technical & Production is responsible for the due diligence process at CEG. The sustainability and human rights policy, endorsed by Group Management, has been communicated through internal channels to ensure active employee involvement. Training initiatives aim to provide employees with the necessary knowledge and focus on promoting sustainability and upholding human rights within the organization. The management system includes written procedures for areas such as HS&E (Health, Safety, and Environment), Purchasing, and Logistics. These procedures are designed to provide guidance and establish a structured approach to managing these specific aspects within the organization.

The Supply Chain

Our supply chain reflects our business area. Since Mecwide Nordics AS is responsible for the detailed engineering, procurement of all piping and equipment (valves, heat exchangers, inertia tanks, pumps, deaerators, flow meters, instruments) of the cooling network, as well as procurement of all piping and equipment for the fire protection network, installation of piping and supports, and testing and flushing of the lines in data centers' we rely significantly on subcontracting for these areas as well as suppliers essential for the good execution of these projects.

Supplier Code of Conduct

Mecwide Nordics AS has established General Purchase Conditions regulations that set forth a supplier code of conduct. These General Purchase Conditions (GPC) have been effectively communicated to all direct suppliers and are now an integral part of the criteria for engaging with new suppliers. The GPC, particularly in point 7, labeled "Quality, Environment, and Safety Requirements," outline the expected conduct from all suppliers.

Risks of Adverse Impacts

The construction industry is inherently a higher-risk area due to the possibility of workplace-related accidents, excessive overtime work, and the use of non-Norwegian subcontractors who may not meet all Norwegian Labor Law requirements. To identify and assess these risks of adverse impacts, Mecwide Nordics AS sent out questionnaires to its biggest suppliers regarding their work practices concerning the respect for basic human rights and decent working conditions. While the majority of Mecwide Nordics' operations take place in the Nordic countries, Mecwide S.A. has a broader scope, working in Belgium, France, Spain, Angola, Mozambique, and other countries. In all these

markets, Mecwide has a serious approach to basic human rights and decent working conditions.

Nevertheless, there are inherent risks associated with Mecwide Nordics' operations and the construction industry. These include:

- Risk of poor or unsafe working conditions and standards;
- Risk of exposure to hazardous substances for humans and the environment;
- Risk of adverse environmental impacts due to the use of raw materials and energy.

We recognize that these inherent risks of adverse impacts on fundamental human rights and decent working conditions may be augmented when working with third parties. As discussed below, Mecwide Nordics has implemented several measures to mitigate these risks and ensure adherence to the Company's guidelines and policies.

Measures to Mitigate Risks

Mecwide Nordics AS evaluates and mitigates risks associated with third-party suppliers through rigorous onboarding and due diligence processes. Measures include standard contract clauses for termination of non-compliant suppliers, regular on-site assessments, continuous training, and communication. We also emphasize environmental and safety standards, working with suppliers to minimize hazardous exposures and adverse environmental impacts. Transparency in our supply chain is maintained through public accessibility of our policies and regular stakeholder updates. Additionally, we continuously try to stay informed about best practices and emerging risks, ensuring robust oversight and commitment to human rights and decent working conditions throughout our supply chain.

Governance and Oversight

Governance and oversight of our human rights and decent working conditions commitments are embedded within our organizational structure. Mecwide Nordics AS implements stringent controls to ensure supplier adherence to both labour laws and internal policies. We conduct thorough due diligence during supplier onboarding, focusing on human rights and working conditions, and provide regular training and communication. Our contracts include clauses that allow for termination if suppliers fail to meet our standards. Incident reporting mechanisms ensure prompt investigation and resolution of non-compliance issues. Our governance framework undergoes regular reviews and updates to remain effective and aligned with best practices and evolving legal requirements, enabling continuous monitoring of supplier performance and strategic adjustments to mitigate emerging risks. These robust measures affirm Mecwide Nordics AS's commitment to human rights and decent working conditions across our supply chain.

Conclusion

Mecwide Nordics AS remains committed to adhering to the Norwegian Transparency Act, promoting human rights, and ensuring decent working conditions across all our operations and supply chains. This statement represents our ongoing efforts to meet these commitments and highlights our dedication to transparency and accountability in all aspects of our business.

For any inquiries or requests for information under the Transparency Act, please contact legal@mecwide.com.