

Statement on due diligence 2023

Gjensidige's organisation and operations are described in the annual report. See in particular the chapters 'Good corporate governance', and 'Human and labour rights'. General insurance is our core business. We also offer pension and savings products in Norway.

1. Framework for safeguarding human rights and working conditions

Human and labour rights are integrated into Gjensidige's management and control system and entail a commitment for the entire Group and all employees, across all units and countries.

Our governing documents rely on the UN Global Compact principles, which we have endorsed. We have also incorporated the UN Convention on Human Rights and the ILO's international standards on human and labour rights, the UN Guiding Principles on Business and Human Rights, as well as the OECD Guidelines on Responsible Business Conduct as guiding principles for our governing documents. We have signed the UN Principles for Sustainable Insurance (UN PSI) and the UN Principles for Responsible Investment (UN PRI). The aim of UN PSI and UN PRI is to ensure that sustainability, including human rights, is integrated into our own and our suppliers' day-to-day operations, and in our investments. We have also signed the Women in Finance Charter, thereby undertaking to work proactively to improve the gender balance in management positions.

The Board has overall responsibility for establishing requirements and guidelines that safeguard human and labour rights throughout our organisation and value chain. The senior group management has operational responsibility for ensuring that this is followed up throughout the organisation. The Board

has set overall requirements for human and labour rights in its corporate governance policy, in addition to requirements for responsible investments in its financial risk management policy. In addition, the administration has prepared the following governing documents:

- Sustainability policy
- Procurement policy and self-declaration on corporate social responsibility
- Instructions for exclusions and instructions for the exercise of ownership rights
- Diversity instructions
- Code of Conduct

We carry out due diligence to identify possible violations of human and labour rights by our suppliers. We use insights from these assessments to prevent and mitigate conditions that may adversely affect human and labour rights.

If anyone suspects human and labour rights violations, they can report it through our external notification channel: Gjensidige (mittvarsel.no)

1.1 SUPPLIERS

Our suppliers are required to sign a self-declaration based on the UN Global Compact principles. We screen and follow up our suppliers through sustainability audits performed by EcoVadis. Gjensidige's requirements for procurement processes are set out in the group procurement

policy, which applies to the whole Group. All our suppliers must sign a self-declaration on corporate social responsibility that as a minimum requires compliance with the 10 UN Global Compact principles.

Through the self-declaration, suppliers confirm that they will:

- Ensure that guidelines relating to internationally recognised principles for human and labour rights are complied with and that they make the same requirements of their suppliers of goods and services
- Ensure that products delivered to Gjensidige are of high environmental quality, that the precautionary principle is complied with and that environmental technology has been implemented as far as possible
- Comply with ethical requirements, including for anti-corruption.

Companies that provide services in connection with claims payments for damaged buildings in Norway must be certified in Startbank. Startbank is a register of suppliers that is used by purchasers in the fields of building, construction, public administration, insurance and real estate. For other procurement categories, our internal purchasing organisation carries out similar controls.

This ensures that qualified suppliers are law-abiding and that competition takes place on equal terms. All material procurements are ordered

electronically. As far as possible, all suppliers shall use electronic invoicing.

Competitive tender procedures are carried out with the help of digital portals. The use of digital tools ensures that all processes are documented and verifiable. It also prevents irregularities and reduces the consumption of paper. We follow up our most important suppliers' compliance with their CSR self-declaration through the recognised EcoVadis portal. To encourage improvement in the value chain, we require suppliers of services relating to motor vehicle and building repairs to aim for at least a Silver score in EcoVadis.

Through the EcoVadis portal, suppliers are required to answer questions about the environment, working conditions, ethics and their requirements of subcontractors. The companies are then given a score and feedback on points for improvement. We enter into dialogue with suppliers who need to remedy shortcomings. Failure to comply with our requirements is considered breach of contract.

1.2 INVESTMENTS AND ASSET MANAGEMENT

For our investments and asset management, we seek to contribute widely to the safeguarding of human rights through responsible investments, as a follow-up to our commitment to the UN PRI. We monitor that all the companies we invest in comply with our requirements. This is followed up quarterly either through direct dialogue or through our managers. In the event of a violation, we engage in dialogue. If we are unable to exert

influence, exclusion is one of the measures that will be considered. This is regulated in the instructions on exclusions. See also the chapter 'Responsible investments' in our 2023 annual report.

1.3 OUR EMPLOYEES

Gjensidige recognises ILO and OECD conventions and supports their promotion of decent work based on social justice and internationally recognised labour rights. All our employees have full freedom of association, and trade unions are free to recruit members from among our staff. Independent HSE audits are conducted in Norway, Sweden and Denmark to verify compliance with statutory requirements and HSE procedures.

Working environment issues are integrated in the annual HSE survey to identify matters requiring special attention. For each department, we define an action plan that is followed up by the respective managers, at the same time as each department conducts an HSE risk assessment. Gjensidige also makes continuous efforts to ensure equality and prevent discrimination. We have a Diversity and Inclusion Committee consisting of HR and trade union and representatives, which convenes every quarter.

Under Norwegian law, our employees are entitled to be represented on the Company's governing bodies. Gjensidige Forsikring ASA's Board of Directors includes three employee representatives elected by and from among the employees.

For our employees, the Basic Agreement between Finance Norway and the Finance Sector Union, together with the rules in the Labour Dispute Act, shall form the basis and provide rules for negotiations on the establishment of collective agreements. Gjensidige has a similar agreement with Tekna. The agreements contain provisions on the relationship between the parties and the rights and obligations of trade union representatives, and form the basis for cooperation between employers and employees. These agreements lay down further provisions on how employees, through their union representatives, are to be ensured influence

in matters relating to employment and working conditions. The agreements also set requirements for the work on facilitating diversity and gender equality. Through influence and cooperation, including employee representation on the Board, employees will, based on their experience and insight, contribute to ensuring safe and good jobs in the company, and be given opportunities for self-development.

2. Procedure for conducting due diligence

2.1 SUPPLIERS AND BUSINESS PARTNERS

Due diligence is carried out to analyse the risk of violations of fundamental human rights and decent working conditions in the various parts of the organisation, in the supply chains and with other business partners. Priority will be given to work based on risk and materiality, based on the following criteria:

- **Volume:** Suppliers with a high purchasing volume.
- **Country:** Suppliers in high-risk countries with regard to human and labour rights violations.
- **External rating score** (for example Sustainalytics, EcoVadis, exclusion list).
- **Companies with known events** relating to violations of human rights and decent working conditions.

Suppliers that are covered by one or more of the criteria are assessed in more detail to clarify the risk.

An individual assessment shall be carried out of suppliers who are deemed to represent high risk as a result of at least one of these criteria. Investigations shall be carried out to assess the risk of potential and actual negative impact on human rights and working conditions.

Examples of specific risks in these areas that are most relevant to Gjensidige's operations are:

- Risk of us violating fundamental rights, especially in the Working Environment Act.
- Risk of failure to safeguard health, safety and the environment at work.
- Risk of pay conditions that do not ensure a living wage.
- Risk of violations of regulations on working time, rest periods, holidays and time off.
- Risk of lack of right to organise.
- Risk of discrimination and inequality.
- Risk of breach of the right to privacy, including data protection.

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

Further investigations will mainly consist of obtaining information and documentation from external sources and from the supplier. Relevant checks and investigations may include searches in open sources (supplier's website, publications, own statements), completed EcoVadis, information from supplier follow-up and control, and answers to distributed questionnaire on self-evaluation.

Based on the results of further investigations, the risks associated with the specific supplier must be assessed and, if necessary, further measures must be taken.

2.2 OUR EMPLOYEES

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

Mapping of risk in our own operations for each country and each type of company we are involved in.

Review of annual HSE risk assessment, and process for preparation of gender equality report.

Analysis and follow-up of events in the Group's event register and events reported to the Internal Investigation Unit through the notification channel and other internal sources.

Monitoring of inquiries in the ethics mailbox.

We will work to further develop due diligence procedures for our own operations, including preparing an annual cycle that ensures more effective coordination with established processes for HSE risk assessments, gender equality work and results from the MyVoice engagement survey.

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

Through our risk assessments, we have investigated which areas affect us most, for the purpose of identifying in which parts of the human and labour rights field we are most at risk of deviations. Based on this assessment, we see that the following areas can be challenging, and therefore particularly important to follow up:

3.1 OUR EMPLOYEES

In general, we consider the risk of violations of human rights and decent working conditions to be low for employees in the Group. The areas associated with elevated risk are summarised below.

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

The most material risk our employees are exposed to is the risk of violence and threats from customers. This is limited to customer advisers and other staff in direct contact with customers.

A total of 21 threat cases were registered in 2023, where the majority are threats from external parties. All of these were dealt with by the internal investigation unit. 1-2 cases per year warrant

measures beyond engaging with the person making the threat.

Measures to prevent and manage the risk include:

- Instructions and procedural description for dealing with threats, threatening behaviour and violence are available to all employees in the HSE manual.
- Preventive measures include training in current whistleblowing procedures, information about how to behave in difficult situations, annual training on threat situations, good staffing planning and alarms in reception areas.
- If necessary, a separate response group is convened in which the Investigation, Group Security, relevant manager and HR participate.
- Each case is assessed and dealt with by the internal investigation unit, including whether the case should be reported to the police, as well as short-term and long-term measures for the follow-up and protection of employees.
- We have identified certain factors that increase the risk of threats in different contexts. We have identified risk mitigation measures and provided training in these.

Results of the measures:

- Due to very few cases with different characteristics, it is difficult to measure the effect of the action taken.

The MyVoice engagement survey shows a slight increase in employees' belief that Gjensidige will respond satisfactorily to serious violations at work.

Risk of discrimination or lack of equal treatment of employees

The Gender Equality Report provides in-depth information about Gjensidige's efforts relating to discrimination, equality and diversity. In cooperation with the Diversity and Inclusion Committee, the HR department has worked to identify the risk of discrimination and obstacles to equality.

The most relevant risks for Gjensidige are described in the Gender Equality Report.

Four incidents relating to discrimination and harassment have been recorded in 2023. The incidents are treated as irregularities in line with instructions for handling irregularities and malpractices.

Measures to prevent and manage risk include:

- Instructions for diversity, and instructions for handling irregularities and malpractices.
- Procedures for preventing and dealing with bullying, which are available to all employees in the HSE manual.
- We have an ethics mailbox and a notification channel where employees can report observations and incidents.
- Gender equality and discrimination are included in the annual performance appraisal interviews with managers and regularly included as a topic in the MyVoice surveys (anonymous).
- Measures relating to gender equality and discrimination as described in the Gender Equality Report.

Results of the measures:

- The Statement on Gender Equality describes the results of measures.
- The MyVoice engagement survey shows that employees give Gjensidige a stable, high score on gender equality.

Employee privacy

As an insurance company, we possess a range of personal data about both customers and employees. Processing of personal data entails an inherent risk of personal data falling into the wrong hands, including employees' personal data.

As the Group has a high focus on safeguarding the privacy of customers, the level of knowledge about and attention to employee privacy is also high. No non-conformities were reported regarding employees' personal data in 2023 that entailed a high risk for employees. Each instance has been

assessed separately and measures implemented. We are not aware of any negative consequences for the privacy of employees.

Measures to prevent and manage the risk include:

- Governing documents for the handling of personal data that apply to both customers and employees, including policies, instructions for the processing of personal data for employees, a privacy statement for employees and associated procedures.
- Regular training of employees and managers in the processing of personal data.
- Data protection officers advise on privacy issues regarding both customers and employees, and monitor and control compliance.
- We have a network of representatives from different departments who have been assigned a special responsibility for privacy.
- We have good processes for handling privacy incidents and for notifying those affected by personal data breaches.

3.2

SUPPLIERS AND BUSINESS PARTNERS

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

We have not identified any actual negative consequences or violations of human rights and decent working conditions for suppliers and business partners, and the risk is generally considered low. The areas associated with elevated risk are summarised below.

We mainly buy services from our suppliers, and to a lesser extent goods. In total, we use more than 9,000 suppliers for administrative and claims-related purchases.

3.2.1

Administrative procurement

Administrative procurement includes rental of offices, outsourcing services, office equipment,

travel services and other goods and services our employees need to carry out their work. The suppliers used are both local and international. The scope of these procurements is substantial, and they are therefore an important follow-up area for Gjensidige. Some administrative procurements are related to foreign suppliers, including in India, which we devote particular attention to and follow up through, among other things, checking working conditions for the suppliers' employees.

Staffing and cleaning: Cleaning is generally an industry with a high risk of violations of decent working conditions and a risk of inadequate attention to HSE regulations in the workplace. Staffing and cleaning are also considered vulnerable industries with regard to social dumping and work-related crime (Source: Fafo report 2019:35 Menneskehandel i arbeidslivet).

Measures:

- Regular status meetings with our suppliers, including follow-up of sickness absence and of our duty to provide information and ensure that pay and working conditions are satisfactory.
- Ensuring that suppliers have the required approvals and certifications.
- Further investigations are being carried out for our two biggest suppliers of staffing and cleaning services in line with our due diligence procedures.

Geography: Gjensidige has a handful of suppliers outside our area of operation, including in the UK, Poland, the USA, Israel and India. Suppliers with operations in India and Israel have, through due diligence, been identified as representing the highest risk of violations of human rights and decent working conditions.

India has the lowest score on the Global Rights Index, which rates countries in terms of respect for labour rights. This is due to, among other things, repressive labour laws, union busting and violent attacks on protesting workers (Source: Global Rights Index 2023).

For Israel, the index for political instability and/or politically motivated violence has increased to a critical level in connection with the war in Gaza. The Responsible Sourcing Tool shows that Israel has a moderate risk of human trafficking in the workplace, but that active war/conflict can contribute to weakening the rule of law and potentially increase this risk (Source: [Responsible Sourcing Tool](#)).

Measures:

- Further investigations of suppliers are being carried out in line with our due diligence procedures.
- Regular assessments are carried out for country and corporate risk.
- Supplier checks have been carried out for the selected suppliers.
- Going forward, we will further develop supplier control procedures with indicators for 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.

For claims-related procurement, framework agreements are an important approach, enabling us to carry out systematic quality control and contribute to supplier development. Our framework agreements contain requirements for self-review and documentation, and follow-up of social and environmental responsibility, including labour rights and compliance with statutory rights and obligations.

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:

- 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 good 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:

- 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

Risk and due diligence assessments for other companies in the Group

Statements under the Transparency Act for other group companies that are subject to the requirements:

- [Gjensidige Pensjonsforsikring AS](#)
- [Gjensidige Mobility Group AS](#)
- [RedGo Norway AS](#)
- [Flyt AS](#)

The statements are updated at least annually and are available here: [Our compliance with the Transparency Act](#).

4.

Results of our supplier follow-up in 2023

- A total of 95 per cent of payments are made to suppliers who have signed the Supplier Code of Conduct and thus undertaken to comply with the UN Global Compact principles.
- We have followed up 73 of our largest suppliers through the EcoVadis platform. All suppliers receive feedback on areas for improvement in dialogue with our procurement managers or directly from the EcoVadis platform.
- General due diligence of suppliers and business partners in 2022 resulted in 38 suppliers being selected to undergo a more thorough assessment in 2023. As part of this work, additional information about the suppliers was obtained, including through questionnaires, a review of EcoVadis results and other available information. The work is still ongoing, but no actual negative consequences have been identified.
- In 2024, we will further develop procedures and measures. We will also follow up the selected suppliers at regular intervals. and carry out further analyses of selected areas.

We make continuous efforts to improve our systems and procedures for monitoring suppliers' commitment to human and labour rights, and their environmental impact. We also seek cooperation with other companies to help strengthen our shared responsibility for labour and human rights, and to identify increasingly effective measures and tools to detect and remedy violations.