



Norwegian Transparency Act – Oras Group

This statement covers the financial year of 2025.

1. Purpose

The purpose of this statement is to communicate the work Oras Group does to ensure due diligence and fulfillment of the Norwegian Transparency Act.

Respect for human rights and decent working conditions in connection with the production of goods and the provision of services is at the core of our operations.

The work with due diligence assessments is a continuous process where the objective of Oras Group is to ensure human rights and decent working conditions in our own business and the whole supply chain. In our annual sustainability disclosure we further open our processes and practices.

2. Responsibilities

The managing director (CEO) has the ultimate responsibility for ensuring that the law is fulfilled and delegates the mandate to the management team. Heads of purchasing and sustainability are responsible for the practical implementation and follow-up of the defined processes.

3. About Oras Group

Oras Group is a bathroom sanitary fittings supplier. In 2025 Oras Group acquired the Gustavsberg and Vatette businesses and brands, transforming the company into a multi-brand sanitary products and solutions provider with a strong position in the Nordics and a significant presence in Central Europe. Our success is now driven by delivering excellent user experience through four strong brands: Oras, HANSA, Gustavsberg and Vatette. The company's mission is to create the smartest and most sustainable water experiences for everyone, and its vision is to become the Perfect Flow Company. Oras Group is fully owned by Oras Invest, a family company, and an industrial owner.

The domicile of Oras Ltd, the parent company of the Group, is located in Rauma, Finland, and the Group has three manufacturing sites: Olesno (Poland), Rauma (Finland) and Vårgårda (Sweden) as well as a ceramics assembly facility and warehouse in Gustavsberg (Sweden). The Group operates with its own staff in 16 markets. Oras Group's 2025 net sales were 300.9 million euros (pro-forma figure, incorporating full-year data from the operations acquired in 2025), and at the end of the reporting period the company employed 1421 people.

Oras Oy (Finland)

Business ID: 1988049-0

VAT Number: FI19880490

Legal Entity Identifier (LEI): 7437 00OI 8EM6 2M25 5Q28

CEO: Lehtinen, Kari

Chairman of the Board: Kari Kauniskangas

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Oras Group wants to contribute positively to promoting respect for human rights and employee rights. The company therefore chooses to work with responsible suppliers and collaboration partners. Work is being done systematically to incorporate the human rights aspect into our business and towards our partners. We do this, among other things, by giving our employees decent wages and regulated working hours. We have zero tolerance for child labor or forced labor in our own business - and in the supply chain. We exercise a high degree of caution when we have business or business partners in areas where human rights and labor rights stand weaker.

4. Our way to operate

We do not accept any violation of human rights internally or externally. We expect our suppliers and partners to, as a minimum, offer decent working conditions in line with national laws and/or international conventions.

[Oras Group Code of Conduct](#) serves as the cornerstone of the company's identity, work community, and ensures being a responsible corporate citizen. Rooted in Oras Group's core values, it defines the company culture and guides our decisions and actions, both big and small. These values apply universally to all members of the Oras Group, fostering integrity, accountability, and ethical behavior in everything we do. We are committed to adhering to all applicable national and international laws and regulations while upholding the highest ethical standards.

[Oras Group Supplier Code of Conduct](#) is an extension of these commitments. Its purpose is to ensure that Oras Group suppliers and their supply chains operate in full compliance with applicable laws and meet the same high standards of ethical conduct, environmental stewardship, and social responsibility that we uphold. These principles are fundamental to maintaining our shared vision of sustainability, integrity, and fair business practices.

This Supplier Code of Conduct is a binding part of any agreement or contract between Oras Group and its suppliers. The definition of "Supplier" also includes Supplier's own 1st tier suppliers, contractors and other business partners participating in the delivery of products, components, materials or services to Oras Group. The Supplier shall ensure that its own 1st tier suppliers, contractors and other business partners participating in the delivery of products, components, materials and services to Oras Group comply with the minimum requirements set out in this Code, and that this Code is communicated by the Supplier to them. This Code outlines the minimum requirements for employment practices, environmental protection, and business integrity that we expect from all suppliers and their respective supply chains.

By adhering to these principles, suppliers not only contribute to a sustainable future but also strengthen the foundation of our mutual success. Oras Group looks forward to working together with suppliers to uphold these standards and address challenges proactively.

5. Managing the supply chain

5.1 Our approach

As a foundation of our partnership, our main suppliers have signed our Supplier Code of Conduct, which is based on our Company Code of Conduct.

Furthermore, those suppliers are regularly required to update our Supplier Self-Evaluation Form. In 2025 Oras Group formulated and introduced an improved Sustainability Self-Evaluation Questionnaire, to be part of our supplier Self-Evaluation Form and overall supplier evaluation process. The new Sustainability Self-Evaluation Questionnaire was sent to all our direct suppliers as well as to the most important indirect suppliers. The questionnaire includes a comprehensive set of questions in the fields of data protection & intellectual property, environmental responsibility, business ethics & legal compliance, Occupational Health & Safety (OHS), human rights & labor practices (including prevention of child labor and compliance to minimum wages), as well as quality, supply chain and risk management. The newly formulated questionnaire enables us to gather more detailed information on many relevant sustainability fields and helps us ensure due diligence and fulfillment of the Norwegian Transparency Act.

The information gathered from our Supplier Self-Evaluation Form, and especially the renewed Sustainability Self-Evaluation Questionnaire as part of it, is used for the Sustainability Rating of the Supplier inside our Annual Supplier Evaluation. Beside this, we are using the data and analysis as part of our Risk Assessment, which we are conducting for the following topics:

- Child Work Risks
- Minimum Wage Compliance
- Corruption Risks
- Use and Handling of Hazardous Substances
- Production Process related Risks (Work Safety)
- Conflict Minerals Risks

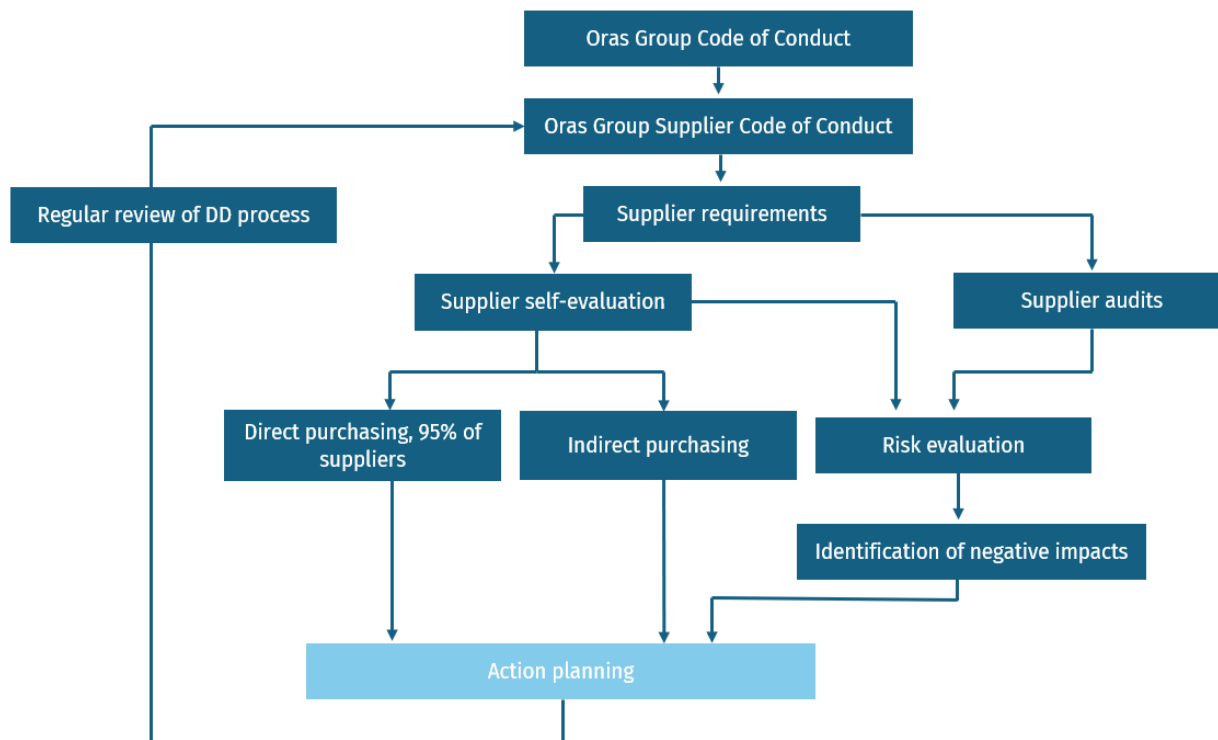
The information given by our suppliers, is validated by recurring, detailed supplier audits, which we conduct at the supplier premises, based on a yearly updated priority list. This audit prioritization is also influenced by the results of our risk analysis.

Beside the information and analysis of the Supplier Self-Evaluation Form, we are using information, studies and indexes from ILO (International Labour Organization, a United Nations agency) from TI (Transparency International, a global civil society organization), from the Global Slavery Index (walkfree.org), the ITUC Global Rights Index (International Trade Union Confederation) as well as from WWF (World Wide Fund for Nature), especially for the categorization and evaluation of country and industry related risks.

As a general methodology for the assessment of risks, we are using a rating scale which rates the likelihood – on a scale from 1 (very unlikely) to 5 (very likely) – as well as the potential impact of violations – on a scale from 1 (very minimal impact) to 5 (severe impact).

Based on the risk evaluation results and the identification of possible negative impacts in supplier audits, an action plan is created and regularly followed up.

As also required by the transparency act, the described process is repeated regularly.



5.2 Negative consequences and risks

In terms of “Child Work Risks”, “Minimum Wage Compliance” and “Corruption Risks”, our risk analysis has been based on information given by supplier with their “Supplier Self-Evaluation Form”, but also based on studies and indexes from ILO (International Labour Organization, a United Nations agency) and from TI (Transparency International, a global civil society organization). The newly formulated Sustainability Self-Evaluation Questionnaire requires suppliers to ensure that they have practices in place to: (i) avoid employing individuals below the legal minimum working age, (ii) provide wages and benefits that meet or exceed local legal and industry standards, and (iii) conduct business ethically and in accordance with anti-corruption laws. Suppliers are also asked to confirm that they have procedures in place to prevent corruption, including bribery and facilitation payments.

Of the countries, in which our suppliers are located, those which are rated with highest risks in terms of the above-mentioned topics, are China, Turkey and Hungary. After a more detailed screening of our suppliers located in those countries, we did not find any reason or evidence of increased risks compared with other suppliers located in countries with a higher rank in those evaluations. Despite their location in these countries, all these suppliers are well known companies in our industry, delivering to several other big competitors and brands. They are A-Class suppliers not just in terms of their technical know-how, but also in terms of their established processes in terms of human rights. We have decided to update our internal process so that suppliers from these countries must return their filled Self-Evaluation Form, including the Sustainability Self-Evaluation Questionnaire, a signed Code of Conduct, and perform regular on-site audits by our organization.

In terms of “Use and handling of Hazardous Substances”, our risk screening has shown that the highest risks are related to the use of chemicals during the process of chrome-plating of components. A more detailed screening of all suppliers of chrome-plated components has not shown any significant risks. We decided to update our audit plans to include more safety-related questions about the chrome-plating process and handling of chemicals. Furthermore, the renewed Sustainability Self-Evaluation Questionnaire requests suppliers to disclose whether they have (i) clear and safe procedures in place for chemical storage and handling, and (ii) systems in place for hazardous waste management.

In terms of “Production Process related Risks” (Work Safety), our risk screening has shown that the processes related to the highest risks for work safety topics, are forging of brass parts as well as stamping of brass and stainless-steel parts. Those suppliers, manufacturing parts from the commodity groups mentioned, have been screened more deeply for potential risks. All our suppliers which deliver such components, are industry-wide, well-known suppliers and absolute experts in the field of forging and stamping. Furthermore, as they are part of our Top 70 Preferred Partners, we have been auditing them several times. There have not been recognized work safety related risks during these audit visits. However, we decided to put further work safety related questions on our audit checklist for the next coming audits of those suppliers to further mitigate any potential risks. In addition, the new Sustainability Self-Evaluation Questionnaire also addressed suppliers’ production process related risks, requesting them to ensure that (i) they take proactive measures to prevent workplace hazards and accidents, and that (ii) adequate safety equipment is available at all key operational sites.

In terms of “Conflict Minerals Risks” our analysis of our products has shown that we are only using very minimal amounts of Tin in some of our products. This tin is used for soldering brass components and electronic assembly groups. We are closely cooperating with the suppliers of such components or products as well as with the suppliers of soldering rings to make sure that they do not use any tin material which has a risk of being sourced from conflict areas. We demand from our suppliers already in our Supplier Code of Conduct to comply with all regulations and legislation concerning the use of Conflict Minerals. Furthermore, we ask our suppliers within our mandatory Sustainability Self-Evaluation Questionnaire if they use any of minerals in our products that originate from conflict-affected and high-risk areas, as defined by EU regulations. If this is the case, then this is a trigger for our Purchasing Team to send out the CMRT (Conflict Minerals Reporting Template) of the internationally known “Responsible Minerals Initiative” to the supplier, in order to achieve a best possible transparency of their sources including the needed declarations. On top of this, such suppliers receive higher priority in our annual auditing plan, which means that we are more frequently auditing those, compared to other suppliers. Within our audits, we are as far as possible validating the information which has been given by the supplier in the CMRT in order to assure that all given information is correct.

[Oras Group’s compliance with EU Conflict Minerals Regulation](#) is publicly available on Oras Group’s webpage.

5.3 Current status and future outlook:

Oras Group has adopted double materiality assessment (DMA) as a continuous process reviewed annually. The double materiality assessment supports the company’s ESG due diligence as a comprehensive process to assess ESG material impacts and financial risks and opportunities in both own operations and value chain. Stakeholders are included in the assessment process, and

the results of the DMA are reviewed by the Group Management Team. The results of the DMA are utilized in reporting on our sustainability in an annual sustainability disclosure. The results of the DMA are also taken into account in our enterprise risk management (ERM).

In 2024 Oras Group updated its Code of Conduct (CoC) and in 2025 its Supplier Code of Conduct (SCoC). In 2025 Oras Group also published its updated policies on Quality, Occupational Health and Safety, and Environment, all of which can be found from [Oras Group sustainability](#) web page. The DMA, as well as the updated CoC, SCoC and policies are a strengthened foundation for Oras Group's sustainability.

As mentioned, during 2025, the Supplier Self-Evaluation Form was updated with a renewed Sustainability Self-Evaluation Questionnaire including many additional questions about sustainability as well as human and labor rights related topics. With this improvement we increase our understanding and knowledge about our suppliers (both direct and indirect) and therewith the transparency of our supply chain. Increased transparency will help us to further finetune our risk assessment and to find the right actions for risk mitigation.

To further improve the follow-up on sustainable procurement matters, the renewed Supplier Code of Conduct and especially the increased transparency which we gain through our improved Supplier Sustainability Self-Evaluation form, enables us to set KPI's and targets to measure the progress of our suppliers more transparently. Examples for more general KPIs for us are the Supplier Code of Conduct (SCoC) signature rate and the Supplier Self-Evaluation Form answer rate. The SCoC signature target rate for 2025 was 90% and we reached the target. The 2025 target for Supplier Self-Evaluation Form answer rate was also 90% and we reached the target with direct suppliers but remained below target with indirect suppliers. In 2026 we will continue gathering responses from indirect suppliers until we reach the target. In 2026, after thoroughly analysing the results of the Supplier Self-Evaluation Form, we will be able to set more focus, priorities and consider targets towards our suppliers, for the improvement of such KPIs like, for example, "Amount of suppliers which are certified for Energy & Environment" or "Amount of suppliers who have a sustainability policy in place including target setting and regular review by management".

During 2025 our supplier audit protocols were updated with a more detailed rating which is used for the validation of results of the Supplier Self-Evaluation form. These additional evaluation results will create our overall rating for the Supplier Evaluation as well as for the risk assessment.

While our monitoring, evaluation, auditing and risk assessment of our direct purchasing suppliers has been in active use for a longer time, the evaluation of our indirect suppliers has been conducted for a shorter time and, until recently, also in a less intensive way. To address this issue, in 2025, we developed and implemented an annual supplier evaluation process for our indirect suppliers in order to improve the risk assessment and monitoring of these suppliers. The first evaluation is ongoing and will be finalized and communicated to our indirect suppliers during 2026. Also, during 2025 we implemented a risk evaluation and management process for indirect purchasing commodities and areas of responsibility. In 2026 we will work with implementing the identified risk mitigation actions into our daily business processes.

With a supplier base of several hundred suppliers, we certainly must prioritize our efforts on suppliers which are either having an increased risk or a big potential impact. The first step is

therefore to do a more detailed risk assessment for those indirect suppliers to identify the priorities and then to – as far as possible – use the same instruments, processes and monitoring as we use for our direct suppliers. Wherever it is needed, we will develop specific criteria (e.g. for service offering suppliers) and evaluation processes.

All planned actions are targeting to increase the transparency of our complete supply chain as well as to step-by-step improve the instruments and tools which we have in place to enable us to better identify the areas of potential risks and to conduct an active risk prevention and risk mitigation approach.

6. Whistle blowing procedure

In cases where deviations from our Code of Conduct or Supplier Code of Conduct are discovered, we must actively work to rectify this. Through dialogue with supplier/collaboration partner, measures must be implemented on a trial basis and then followed up. Termination of agreements/contracts must only take place in cases where measures do not have sufficient effect. In case of serious deviations this must be reported to the Norwegian Consumer Protection Authority.

If our personnel are unsure of how to act right, the first contact point is the supervisor. If observing behavior that is against our Code of Conduct or other principles, everyone is obligated to intervene and report the matter to the appropriate body. The company encourages to primarily contact the supervisor, other management, or the appropriate responsible body. All reports and discussions are treated confidentially. In case personnel do not want to report a breach or misconduct under their own name, they can report the matter anonymously through Oras Group's Whistleblowing Channel.

It is everyone's duty to adhere to our Code of Conduct and to report any non-conformance. A justifiable doubt made in good faith is sufficient. Reporting will not lead to repercussions for the individual.

The whistle blowing channel is found from our company web page or can be accessed here.

7. Contact information

If you need more information, see [Oras Group Sustainability](#) or get in touch by sending a written request to sustainability@orasgroup.com.