

## Account of Due diligence according to the Norwegian Transparency Act (Åpenhetsloven)

Fundamental human rights and decent working conditions is of outmost importance to FUCHS.

FUCHS supports the compliance with international conventions for the protection of people's civic, political, economic, and social rights as well as for the protection of the environment. This includes, among other things, the General Declaration of Human Rights of the United Nations, the Manifesto of the International Labor Organization (ILO) and the initiative for sustainable and responsible corporate governance (UN Global Compact). As a globally active company we accept our responsibility and do everything we can, within the framework of our policies, to ensure compliance with internationally recognized standards for human rights and the environment when it comes to our supply chain.

Hence, FUCHS also expect those involved in its supply chain to act with integrity and respect sustainability, which is why we undertake to only collaborate with suppliers who are aware of these standards and act accordingly.

- FUCHS Group's overarching commitments regarding Social Sustainability, Human Rights and working conditions are further described in [FUCHS Group's Code of Conduct](#). This is a formal policy applicable to all affiliates in the FUCHS Group.
- [FUCHS Supplier Sustainability Standard](#) applies to all companies supplying to any FUCHS company worldwide. Essential parts of the FUCHS Supplier Sustainability Standard are the observance of labor standards, business ethics and compliance, environmental protection and safety.

For more information regarding how we lead, manage and monitor our compliance to the above standards of social sustainability and human rights in FUCHS Lubricants Sweden and Norway, see links related to the topic on our websites.

The following sections describes our Due Dilligence according to the Transparency Act. The scope is FUCHS Lubricants Nordics, involving all suppliers relevant for the Nordic market.

- a) a general description of the enterprise's structure, area of operations, guidelines and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions

FUCHS is a global Group with German roots that has developed, produced and sold lubricants and related specialties for 90 years – for virtually all areas of application and

sectors. With 58 companies and more than 5,700 employees worldwide, the FUCHS Group is the leading independent supplier of lubricants.

Business region FUCHS Nordic legally consists of four legal entities representing the regional markets; FUCHS LUBRICANTS SWEDEN AB, FUCHS LUBRICANTS NORWAY AS, FUCHS LUBRICANTS DENMARK ApS and FUCHS OIL FINLAND OY. These companies are subsidiaries to FUCHS PETROLUB SE, a global Group based in Germany which produces and distributes lubricants and related specialties around the world.

Suppliers related to the production and distribution of lubricants in the Nordic Market are located in Europe while their supply chain may be global, subcontractors or intermediates. All suppliers are monitored, including risk analysis, in various areas including social sustainability. Supply chain social sustainability is evaluated both by geography and branch (method ESG country and industry risk) as well as individually by supplier (self-assessment) using the tool IntegrityNext. The social area includes the aspects of forced labor and abuse, child labor, working conditions and wages, discrimination, the right to collective bargaining and freedom of association, health and safety and diversity.

b) information regarding actual adverse impacts and significant risks of adverse impacts that the enterprise has identified through its due diligence

Through the due diligence performed as described above, FUCHS has identified 4 suppliers with a potential risk.

c) information regarding measures the enterprise has implemented or plans to implement to cease actual adverse impacts or mitigate significant risks of adverse impacts, and the results or expected results of these measures.

Corrective and preventive measures in place, step wise: 1) Supplier is informed of their risk status and asked to review their submitted answers. Possible measures by FUCHS are also mentioned 2) Those who have not improved their status or have not been able to improve it are subjected to an examination based on the appropriateness criteria 3) Protocol of actions agreed between the parties 4) Implementation of measures in the respective companies.

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