



MDE Norway

Transparency Act



2026

Reporting period: 1 January 2025 – 31 December 2025

Executive Summary

MDE has conducted due diligence assessments in accordance with the Norwegian Transparency Act and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

As of 31 December 2025, MDE Norway employed 550 people and maintained relationships with 411 active suppliers and business partners. A risk-based supplier assessment was conducted across the supply chain, resulting in the identification of 14 suppliers requiring enhanced due diligence and targeted follow-up.

No actual breaches of fundamental human rights or decent working conditions were identified within MDE's own operations or among suppliers subject to enhanced review during the reporting period.

Introduction

This statement has been prepared in accordance with Section 5 of the Norwegian Transparency Act (Åpenhetsloven).

The purpose of the Transparency Act is to promote enterprises' respect for fundamental human rights and decent working conditions and to ensure public access to information regarding how businesses address actual and potential adverse impacts.

This statement describes MDE's due diligence efforts related to human rights and decent working conditions in its own operations, supply chain, and business relationships during 2025.

About MDE

MDE is a leading provider of recruitment, staffing, engineering consultancy, and workforce solutions to the energy, industrial, and technology sectors.

At year-end 2025, MDE Norway employed 550 employees and collaborated with 411 active suppliers and business partners.

MDE's operations are built on the core values:

- Professional
- Proactive
- Respect
- Fun

These values guide how we interact with employees, consultants, customers, suppliers, and society.

Governance and Accountability

Responsibility for compliance with the Transparency Act is anchored within the Board of Directors and Executive Management.

Operational responsibility is assigned to management functions responsible for procurement, quality, HSE, HR, and compliance activities.

Due diligence findings are reviewed as part of MDE's overall risk management framework and are reported annually to the Board.

MDE has implemented several governance mechanisms supporting responsible business conduct, including:

- Code of Conduct
- Human Rights & Labour Standards Policy
- Supplier Qualification Process
- Whistleblowing Procedures
- Anti-Corruption Guidelines
- HSE Management Systems

All suppliers and business partners are expected to uphold standards equivalent to those applied by MDE.

Human Rights and Labour Standards

MDE's Human Rights & Labour Standards Policy is based on:

- The United Nations Universal Declaration of Human Rights
- The United Nations Guiding Principles on Business and Human Rights
- ILO Core Conventions
- The Ten Principles of the UN Global Compact

MDE maintains a zero-tolerance approach to:

- Forced labour
- Modern slavery
- Human trafficking
- Child labour
- Discrimination
- Harassment
- Inhumane or unsafe working conditions

MDE recognises employees' rights to freedom of association and collective bargaining and promotes open dialogue through established grievance and reporting mechanisms.

The policy applies to employees, directors, consultants, hired personnel, agents, and all individuals acting on behalf of MDE.

Due Diligence Methodology

MDE conducts due diligence assessments in accordance with the OECD Guidelines for Responsible Business Conduct.

The due diligence process includes:

1. Embedding responsible business conduct into policies and procedures
2. Identifying and assessing potential adverse impacts
3. Implementing preventive and mitigating measures
4. Monitoring effectiveness and follow-up
5. Communicating results and reporting
6. Continuous improvement

Due diligence activities are integrated into procurement processes, supplier qualification, contract management, and ongoing supplier follow-up.

Supply Chain Mapping and Risk Assessment

During 2025, MDE assessed 411 active suppliers and business partners. Each supplier was evaluated using a structured risk model considering:

- Geographic risk
- Industry risk
- Subcontractor risk
- Labour intensity
- Privacy and data access
- Business criticality

Based on these assessments, suppliers were categorised as follows:

| Risk Category | Number of Suppliers |
|----------------------|----------------------------|
| Low Risk | 330 |
| Medium Risk | 67 |
| High Risk | 14 |

The majority of suppliers operate within Norway and the Nordic region, where labour standards and regulatory compliance are generally strong. Overall supply chain risk is therefore considered low to moderate.

High-Risk Suppliers and Enhanced Due Diligence

As part of MDE's risk-based due diligence process, a limited number of suppliers and business partners were identified as requiring enhanced due diligence and targeted follow-up.

The assessment was based on factors including:

- Labour-intensive services
- Recruitment and staffing activities
- Use of subcontractors
- Access to personal data
- Geographic and industry-related risk factors
- Operational importance to MDE

Enhanced due diligence activities included supplier questionnaires, review of policies and procedures, and follow-up discussions where relevant. The assessments covered areas such as human rights, labour standards, freedom of association, diversity and equality, health and safety, anti-corruption measures, whistleblowing mechanisms, subcontractor management and responsible business conduct.

For confidentiality and commercial reasons, detailed supplier-specific assessments are maintained internally and may be reviewed as part of audits, regulatory inquiries or other legitimate compliance processes.

Critical Suppliers

MDE relies on a number of suppliers that provide systems and services essential to business operations, information security, communication, and business continuity. These suppliers are subject to ongoing monitoring and oversight through contractual requirements, supplier reviews, and risk-based follow-up activities. For security and commercial reasons, detailed information regarding individual critical suppliers is not publicly disclosed.

Findings and results

The due diligence assessments conducted in 2025 identified no actual adverse impacts related to fundamental human rights or decent working conditions within MDE's own operations.

No confirmed breaches were identified among suppliers subject to enhanced due diligence.

The assessment identified opportunities for improvement relating to supplier documentation, supply chain transparency and subcontractor oversight. Corrective and preventive measures have been implemented or are being followed up through MDE's established governance processes.

Detailed assessment results, supplier-specific findings and supporting documentation are maintained internally and are available for review by relevant authorities or auditors where required.

Whistleblowing

MDE maintains whistleblowing channels available to employees, consultants, customers, suppliers, and other stakeholders.

During 2025:

- Total whistleblowing cases received: 0
- Human rights related cases: 0
- Labour standards related cases: 0

Actions implemented in 2025

During the reporting period, MDE:

- Further developed its supplier assessment process
- Conducted due diligence reviews of 411 suppliers
- Performed enhanced follow-up of 14 high-risk suppliers
- Strengthened supplier documentation requirements
- Continued implementation of ethical business conduct requirements
- Maintained whistleblowing and grievance mechanisms

Priorities for 2026

During 2026, MDE will continue to:

- Improve supply chain transparency
- Increase documentation requirements for high-risk suppliers
- Strengthen subcontractor oversight
- Enhance awareness of human rights and responsible business conduct
- Further integrate due diligence into procurement processes

Board Statement

The Board of Directors confirms that MDE Norway has conducted due diligence assessments in accordance with the Norwegian Transparency Act and the OECD Guidelines for Responsible Business Conduct. The Board considers that MDE has established adequate governance structures and processes to identify, prevent, mitigate, and monitor risks related to fundamental human rights and decent working conditions. No actual breaches were identified during the reporting period.

Stavanger, 25 June 2026

For the Board of Directors.

Jan Arild Wathne
Chairman of the Board

Svein Morten Bjustveit
CEO



MDE

Delivering Expertise

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Endelig revisjonsrapport

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