



Norwegian Transparency Act Report

Nemko Group

June 30th, 2026

Reporting period: 1 January – 31 December 2025

Contents

Contents	2
1. About Nemko Group	3
2. The Transparency Act – Understanding and Scope	3
3. Managing Human Rights and Working Conditions Within Nemko	3
4. Nemko Supplier Code of Conduct	4
5. Suppliers, Business Partners and Risk Assessment	4
Salient Risks Identified	4
6. Due Diligence Process in 2025	5
7. Findings and Results.....	5
Key Risk Observations	5
8. Measures and Ongoing Work.....	6
Global Vendor Management Process Framework	6
Updated Group Code of Conduct and Integrity Training	6
9. Reflections and Future Direction	7
Revised Focus Areas Under Consideration	7
10. Action Plan.....	8

1. About Nemko Group

Nemko is a private, independent company owned by the NEMKO Foundation, whose objective is to promote product safety and to work for sustainability and the environment. Founded in 1933 and headquartered in Oslo, Norway, Nemko Group is a global provider of testing, inspection, certification, and approval services for electrical products, electronics, medical equipment, industrial machinery, and other equipment.

Nemko operates worldwide across sectors including electronics, power supply, telecommunications, automotive, oil and gas, maritime, and medical equipment, supported by a global network of laboratories, testing facilities, and offices. As a trusted independent third-party organization, Nemko collaborates with national and international certification bodies and authorities to ensure compliance with applicable requirements.

Further information about the company is available at [Nemko.com](https://nemko.com).

An overview of the Group's legal structure is available under [Ownership Structure](#).

2. The Transparency Act – Understanding and Scope

The Norwegian Transparency Act (Åpenhetsloven), which entered into force on 1 July 2022, promotes respect for fundamental human rights and decent working conditions in the production of goods and the provision of services, and ensures public access to information on how enterprises address adverse impacts. Nemko aligns its due diligence with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

This statement covers the period 1 January – 31 December 2025. Nemko applies its due diligence and supplier-management measures broadly across the Group. In Norway, the Group is present through Nemko Group AS, Nemko Scandinavia AS, Nemko System Sikkerhet AS and Nemko Norlab AS which are directly subject to the Act. The structured vendor assessments described in this report were rolled out first within these entities, with the intention of extending the approach across the Group over time. This account is made publicly available on Nemko's website (nemko.com) and is intended to satisfy the reporting obligation under the Act for each of these four Norwegian entities.

The Group management team is responsible for the measures required under the Act, and the Board of Nemko Group is kept informed of the Transparency Act work as part of the Group's regular governance cycle. Responsibility for local implementation rests with the managing director and finance manager of each unit, with oversight from Group Finance. An anonymous whistleblowing channel is available to employees across all units.

3. Managing Human Rights and Working Conditions Within Nemko

In addition to supplier-related risks, Nemko is committed to identifying and addressing potential risks related to human rights and working conditions within its own operations. In practice this means:

- Ensuring that employment practices across Nemko entities comply with local labor law, ILO core conventions, and Nemko's internal HR policies.
- Promoting non-discrimination, equal opportunity, and freedom of association in all locations.
- Maintaining safe and healthy working conditions through HSE risk assessments, compliance with occupational safety standards, and ongoing training.

- Enabling employees to raise concerns confidentially through an anonymous whistleblowing mechanism, available in all local units.

Nemko's Group HR / Business Enablement, Legal, Quality & Risk functions work with local leadership to ensure that any concerns are addressed promptly and transparently. Internal risks are assessed on an ongoing basis as part of Nemko's broader due diligence under the Act.

4. Nemko Supplier Code of Conduct

The [Nemko Supplier Code of Conduct](#) sets out Nemko's expectations of vendors regarding human rights, working conditions, anti-corruption, and environmental responsibility. Its application is risk-based and depends on Nemko's ability to influence the vendor; vendors that already maintain equivalent standards through their own policies or certifications may not be required to sign a separate commitment.

The Supplier Code of Conduct is currently being reviewed. Any updated version will be published on Nemko's website once released.

5. Suppliers, Business Partners and Risk Assessment

In line with Section 3 of the Act, Nemko distinguishes between suppliers — entities that deliver goods, services, or inputs that are integral to Nemko's services, from raw-material stage to finished product — and business partners, which supply goods or services directly to Nemko but are not part of the supply chain (for example cleaning, office supplies, or IT support).

Nemko's risk assessment draws on the DFØ high-risk product list ([Høyrisikolisten](#)) together with a cross-functional internal workshop. Vendors are classified by their potential to breach the Supplier Code of Conduct and by Nemko's ability to influence their conduct, resulting in three risk levels:

Risk Level	Representative Vendor Categories
Risk Level 1 — highest risk (DFØ high-risk list)	Building construction & maintenance, office supplies, food & beverage services, IT equipment (servers, monitors, devices).
Risk Level 2 — increased risk, Nemko can influence	Middlemen & sales agents, local transport, waste management, canteen & events, cleaning & sanitary, security & alarm, lab consumables, lease of buildings, certificate bodies.
Risk Level 3 — increased risk, limited influence	Air travel & travel agencies, IT support (non-ISO 27001), lab equipment & instrumentation, consultancy & auditing, energy, software & digital tools.

Salient Risks Identified

The principal human-rights and decent-work risks associated with these higher-risk categories are well documented and guide Nemko's prioritisation:

- Building construction & maintenance, office supplies, and food & beverage services (RL1): labour-rights and health-and-safety risks deep in fragmented, multi-tier supply chains with limited traceability.

- IT equipment and electronics (RL1): forced and child labour, excessive overtime, and poor labour conditions at the component and raw-material stage, where production is concentrated in higher-risk regions.
- Middlemen, GMA agents and sales agents (RL2): facilitation payments, trading in influence, corruption, and related sanctions exposure in dealings with authorities and certification bodies.
- Cleaning, security, canteen, and local transport services (RL2): precarious employment and risks relating to wages, working hours, and decent working conditions.

There were no significant changes to the vendor risk framework during 2025 as part of the annual review cycle; the classification established in prior years remains valid.

6. Due Diligence Process in 2025

During 2025, Nemko continued its risk-based due diligence using structured questionnaires aligned with the Transparency Act and the OECD Due Diligence Guidance for Responsible Business Conduct. Nemko's due diligence follows the six-step model of the OECD Guidelines — embedding responsible business conduct; identifying and assessing risks; ceasing, preventing or mitigating them; tracking results; communicating; and enabling remediation. Three versions of the questionnaire were used, tailored to Risk Levels 1, 2 and 3, covering labor and human rights, health and safety, business ethics and anti-corruption, supply-chain due diligence, and environmental management.

Consistent with a risk-based and proportionate approach, the assessment focused on a prioritized selection of vendors in the higher-risk categories within the Norwegian entities in the group. This selection represents a relatively small proportion of Nemko's overall vendor base - in line with common practice among comparable enterprises, which concentrate enhanced due diligence on the suppliers with the highest potential risk exposure rather than on the entire vendor population.

7. Findings and Results

The responses received provided a useful overview of the maturity of Nemko's vendor base. The substantial majority of vendors confirmed compliance with national labor laws, ILO core conventions, and fundamental human rights, and most maintain anti-corruption policies, grievance or whistleblowing mechanisms, and health and safety arrangements. Several key vendors — particularly larger suppliers in the higher-risk categories — publish their own Transparency Act statements and operate established compliance and sustainability frameworks.

As with any due diligence that relies substantially on self-reported information, full (100%) confirmation across all vendors is not practically attainable. Vendors differ in size, sector, and documentation maturity, and smaller suppliers in particular may operate sound practices without formal written policies. In line with the proportionality principle and a cost-versus-benefit assessment of the information obtained, Nemko directs its verification effort towards the areas of highest potential risk — primarily Risk Level 1 vendors — rather than seeking exhaustive documentation from every supplier.

Key Risk Observations

- Smaller vendors often rely on informal practices rather than documented policies, which can limit external verification even where practices are sound.
- Subcontractor oversight varies across the vendor base, most notably in service categories such as cleaning, security, and local transport.

- For vendors where Nemko has limited influence or where purchases are largely transactional, the additional insight obtained from standardized questionnaires is modest relative to the effort involved.

These observations are consistent with those typically reported by comparable enterprises subject to the Act.

Importantly, no actual adverse impacts on fundamental human rights or decent working conditions were identified through the 2025 due diligence, and the assessment did not give rise to any remediation cases. Where responses indicated less mature documentation, the vendors concerned are noted for proportionate follow-up — focused on the highest-risk relationships — rather than immediate action.

Should Nemko identify that it has caused or contributed to an adverse impact, it is committed to providing for, or cooperating in, remediation through dialogue with the vendor, corrective-action follow-up, and access to Nemko's grievance and whistleblowing channels.

8. Measures and Ongoing Work

Global Vendor Management Process Framework

Nemko's Global Vendor Management Process Framework — introduced and described in the 2024 report — is now well established and applied centrally across the Group. It provides consistent vendor onboarding, evaluation, risk classification, and approval, with stronger vendor assessments aligned to the Transparency Act, the OECD Guidelines, and ISO/IEC 27001. Vendor records in our ERP reflect risk level, vendor type, and documentation status, and IT vendors with access to Nemko systems remain subject to information-security review.

Nemko also continues to enhance purchase-order (PO) governance within its procure-to-pay process, improving the control and traceability of vendor payments.

Updated Group Code of Conduct and Integrity Training

In February 2026, Nemko revamped its [Group Code of Conduct](#) and rolled out mandatory integrity training across the Group. The Code is built around eight main elements that express a common set of expectations for everyone who works for or represents Nemko:

- Making informed decisions;
- Maintaining impartiality and independence in conformity assessments;
- Safeguarding the confidentiality of Nemko's and customers' information;
- Understanding and abiding by local law and agreements with customers;
- Acting ethically and not engaging in human trafficking or corruption in any form;
- Caring for the environment and sustainability;
- Caring for colleagues and maintaining their trust; and
- Encouraging the reporting of breaches of the Code.

Together with mandatory training, these elements reinforce Nemko's commitment to responsible business conduct and complement the supplier-facing due diligence described in this report.

9. Reflections and Future Direction

The structured questionnaire approach introduced as a first phase has given Nemko valuable experience and a clearer view of its vendor base. Reflecting on this experience, Nemko recognises certain inherent characteristics of a broad, questionnaire-based model: it is administratively demanding for both Nemko and its vendors, and for lower-risk or transactional relationships the additional insight gained can be limited relative to the effort required. These are inherent aspects of this type of due diligence and are commonly acknowledged by enterprises subject to the Act.

Nemko will continue to apply its current approach while focusing on internal system, process, and training improvements that strengthen transparent and responsible procurement practices across the Group. During 2026, Nemko is considering a revision of its approach and has begun assessing the resources required — including potential external service providers and supporting systems — to enable a more automated and value-adding model over time. A revised approach is therefore a likely future direction rather than a change already made.

Revised Focus Areas Under Consideration

The evolving approach is expected to concentrate on three structural focus areas that deliver strong risk-management value relative to effort:

Focus Area	Description
A. Sanctions & compliance screening (priority)	Systematic screening of vendors and customers covering sanctions, anti-corruption and bribery, embargoes, and export controls, aligned with OECD responsible business conduct. Beyond its direct compliance value, this also contributes indirectly to higher-quality, better-substantiated Transparency Act reporting.
B. Strengthened vetting of key vendors & payment transparency	Nemko's key vendor base includes GMA agents, middlemen, subcontractors, and inspectors — relationships that also carry the most relevant risk exposure for our business. The focus is on strengthening the vetting of these key vendors and enhancing transparency in payment practices, supported by continued system and process improvements (including within the ERP).
C. Core vendor vetting	Annual review of strategic and high-spend vendors, directing resources to where Nemko has the greatest ability to influence conduct.

Over time, and in place of broad annual questionnaires, Nemko expects to move towards enhanced due diligence initiated on a proportionate, trigger basis — for example, high-risk geography, credible media allegations, whistleblower reports, significant spend increases, or sanctions exposure — consistent with the OECD proportionality principle.

This direction aims to provide genuine value for Nemko, our suppliers, our employees, and society, while avoiding redundant effort.

10. Action Plan

The following high-level initiatives support the focus areas above and Nemko's continued compliance with the Transparency Act:

Initiative	Responsible	Target
Implement sanctions & compliance screening of vendors and customers	Group Finance	Q1 2027
Continue strengthening ERP vendor payment controls and traceability	Group & Local Finance	Q4 2026
Introduce trigger-based due diligence (linked to screening)	Group Finance	Q1 2027
Annual review of strategic / key vendors	Group & Local Finance	Ongoing
Continue training across units on transparent procurement practices using the system	Group Finance / Local units	Ongoing

This report has been prepared in accordance with Sections 4 and 5 of the Norwegian Transparency Act. It is adopted by the Board of Nemko Group through the Board's approval and signing of the Group's annual Directors' Report (årsberetning), which includes a dedicated Transparency Act section that references and links to this account. Progress on the measures described above is monitored through the Group's quarterly reviews.