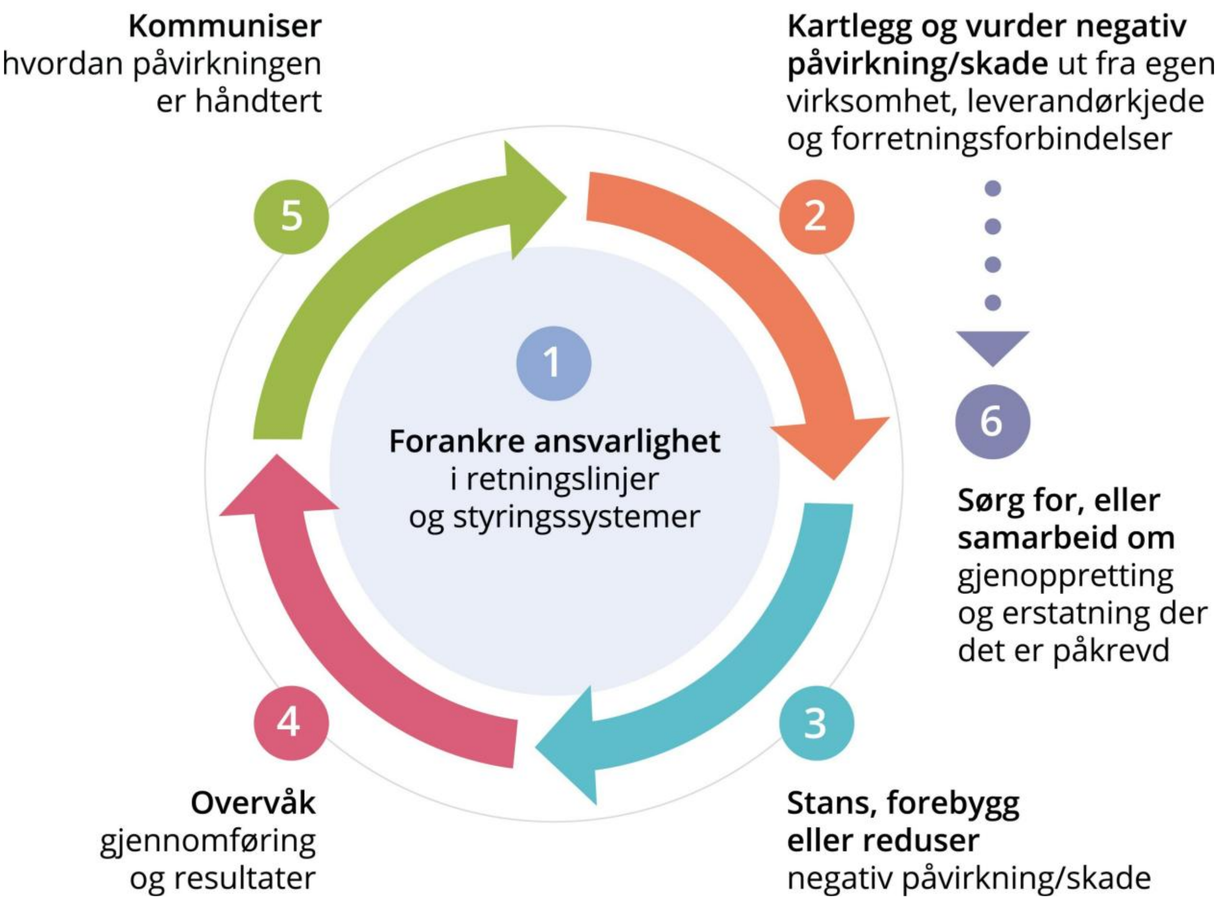
Due diligence assessments for sustainable business practices 2025

Due diligence assessments
This report is based on the UN Guiding Principles on Business and Human Rights and the OECD model for due diligence for responsible business conduct. The model has six steps that describe how businesses can work towards more responsible and sustainable business practices. Being good at due diligence assessments does not mean that a company has no negative impact on people, society and the environment, but rather that the company is open and honest about challenges and handles these in the best possible way in consultation with its stakeholders. This report is divided into chapters based on this model:



Unger Fabrikker A.S
Org.no. 917016011

Key information about Unger and the supply chain

Key information about Unger Fabrikker AS

Name:
Unger Fabrikker AS

Head office address:
Narntegata 25, N-1635 Gamle Fredrikstad
P.O Box 254, N-1601 Fredrikstad

Main products/services:
Unger develops and produces surfactants and chemical solutions used in everything from hygiene products to industrial processes. The company has a long industrial history in Norway and has been an important part of the local community since its establishment in 1922 in Fredrikstad, where production still takes place today. 103 years of Pure Nordic Quality! Unger Fabrikker is located in Fredrikstad and has the whole world as its market. We export approximately 95% of what we produce.

Description of the company's structure and organisation:
The organisational structure facilitates operational activities, business development and systematic work on sustainability and responsible business practice. Unger Fabrikker is owned by the Thon Group, and is a Norwegian company with headquarters in Fredrikstad, Norway. Unger's top management consists of the Board and executive management team, and is led by the Managing Director, who reports to the Board. Unger is organised into functions that cover the company's core areas; operations and production, supply chain, HR, innovation and development, quality, sales and marketing, as well as finance and administration. Responsibilities and roles are defined in internal procedures. Responsibility for sustainability and responsible business conduct is anchored in management. The strategic and operational work is coordinated by the Sustainability Manager, who works cross-functionally with three ESG working groups and reports directly to the Managing Director.

Revenue in the reporting year:
952 000 000 NOK

Number of employees:
122

Covered by the Norwegian Transparency Act:
Yes

Significant organisational changes since the previous reporting and this report's reporting period:
No

Contact, title:
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Key information about the supply chain

General description of the company's sourcing model and supply chain
Unger Fabrikker has its headquarters and production facility in Fredrikstad. The Supply Chain for all production plants is centralised in one department. Supply Chain's responsibility includes operational, tactical and strategic sourcing of raw materials, packaging, transport and everything we need for production and daily operations. In addition, Supply Chain is responsible for ensuring that suppliers comply with requirements and expectations for a sustainable value chain, including fundamental human rights and workers' rights.

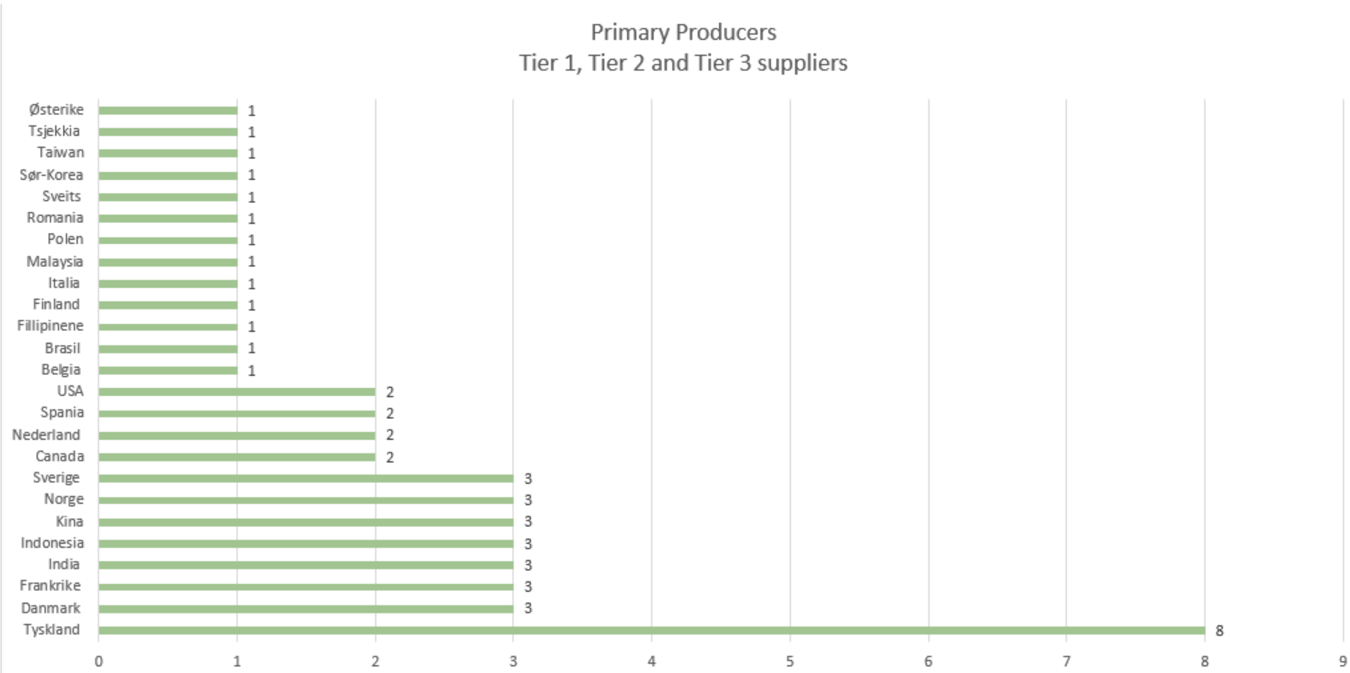
Our due diligence assessments in the value chain cover procurement for all production plants within these purchasing categories: Raw materials, packaging and sub-suppliers. The Head of Supply Chain is part of the company's management team and reports to the Managing Director.

Number of suppliers that the company has had commercial relationships within the reporting year
33

Comment on the number of suppliers
The number of suppliers includes all Tier 1 suppliers that have invoiced deliveries to us in the reporting year.

Type of procurement / supplier relationship (percentage share in number)
Fully/partially owned production: 0%
Purchases directly from producer: 61%
Purchases via agent/intermediary/importer: 39%
Other: 0%

List of primary producers per country:
Primary producer is the actor that physically produces or extracts the raw material, regardless of whether the purchase is made directly or via intermediaries. The list of primary producers includes the number of Tier 1, Tier 2 and Tier 3 suppliers.



Main input factors/raw materials for products and geography:

Raw material category / input factor	Geography
Alkylate	Germany, Netherlands, Belgium, Spain, USA and South Korea
Fatty alcohol	Indonesia and Malaysia
Caustic soda	Norway
Sulphur	EU USA
Plastic packaging and IBC	EU og India
Paper packaging	EU

Unger Fabrikker has the main share of input factors from Norway and European supplier markets. Certain organic-chemical input factors are part of global value chains with origin in Asia, while further processing and/or distribution often takes place via European producers and distributors.

Targets and progress

Process targets and progress in the reporting year

1. **Target:** Strengthened organisation of sustainability work by freeing up resources and hiring a Sustainability Manager.
   Status: The sustainability work was strengthened through the hiring of a dedicated sustainability responsible and the establishment of cross-functional ESG working groups (E, S and G). Sustainability and responsible business practice were further integrated into existing ISO-based management systems (quality, environment and occupational health and safety).
2. **Target:** Further development of due diligence assessments in the value chain
   Status: Unger has worked systematically with risk-based due diligence assessments of suppliers, with particular focus on raw materials and packaging where risk and impact are assessed as biggest.
3. **Target:** Better decision basis through further development of LCA and carbon accounting in collaboration with NORSUS.
   Status: The work with life cycle analyses and carbon accounting has been further developed in 2025 and has provided even better insight into where in the value chain the impact is greatest. This strengthens further work with climate and environment in our sustainability strategy.
4. **Target:** Integration of sustainability into management systems
   Status: Sustainability and responsible business practice are further integrated into existing ISO-based management systems, using internal and external audits as tools for follow-up and improvement.
5. **Target:** Increased internal awareness and anchoring
6. **Status:** Through management meetings, cross-functional arenas and internal communication, the understanding of due diligence assessments and sustainable business practice has been strengthened among employees in relevant roles.

Process targets for the coming year

1. Conduct a Double Materiality Analysis for Unger Fabrikker for revision of the existing sustainability strategy and revised targets for further progress in line with stakeholders.
2. Training of Supply Chain, Development and Quality in due diligence assessments to ensure further development of internal competence on the process itself in relevant departments.
3. Include transport suppliers in the due diligence assessments so that they are also included in the same process as suppliers of raw materials and packaging.
4. All our suppliers delivering raw materials and packaging to Unger shall sign our Supplier Code of Conduct (CoC)
5. Establish and implement an external risk assessment mapping tool for mapping and follow-up of suppliers and customers.
6. External accessible whistleblowing channel where employees, customers and others in the value chain can easily report any critical conditions in the company or our value chain. This whistleblowing channel will be easily accessible and visible on our website.
7. Establish and implement processes for purchase and sale of relevant raw materials in line with EUDR.

1. Anchoring of sustainability in the company

Anchoring responsibility related to sustainable business practices in Unger is about having strategies, plans, relevant policies and guidelines for due diligence assessments that are adopted by management. These cover the entire business, as well as the company’s supply chain and business partners. Effective management systems for implementation are a prerequisite for success, and the work on due diligence assessments is an integrated part of the company’s business operations. Clear expectations from top management, as well as clear allocation of responsibility within the company for the implementation of the different parts of due diligence assessments, are important. Everyone involved must know what they are to do.

Policy for own operations

Link to publicly available policy for own operations
Ethical Guidelines for Sustainable Business Practices

What Unger states publicly about its commitments
Unger is committed to respecting human rights, working conditions, the environment and society throughout the value chain. The commitments are anchored in the company’s strategy, ethical guidelines and international frameworks, and are followed up through risk-based due diligence assessments and systematic supplier follow-up.

We have several suppliers of raw materials and packaging for our production. We are aware that as a company we have influence in our interaction with these suppliers. We have identified several of our raw materials as risk raw materials requiring closer follow-up. A large number of our suppliers and partners we have collaborated with for a very long time, where trust, security and mutual accountability are part of the foundation of our cooperation. We are concerned with ensuring sound working conditions throughout our value chain. All our suppliers of raw materials and packaging are included in our risk-based approval and assessment process.

Unger's commitments are anchored in:

- The company's management, sustainability strategy and value base,
- Ethical guidelines and Supplier Code of Conduct,

- Due diligence assessments carried out in line with OECD guidelines and the UN Guiding Principles on Business and Human Rights (UNGP)
- Relevant ISO certifications (ISO 9001, 14001 and 45001)

To make these positions clear to everyone, we have adopted Ethical Guidelines for Sustainable Business Practices and Supplier Code of Conduct, which are made available on our website together with other communication about our sustainability work; https://unger.no/sustainability/

How the policy for own operations is developed and anchored
Unger's policies for own operations have been developed over time, based on the company's values, relevant international frameworks and experience from operations and risk assessments. The policies are anchored in management, integrated into management systems and operationalised through procedures, training and continuous follow-up.

Our Ethical Guidelines are in line with the UN Guiding Principles on Business and Human Rights (UNGP). The policy is available to all our employees, both via the website and the sustainability report. We anchor it with our suppliers in the supplier approval process.

Organisation and internal communication.

How due diligence assessments are organised in Unger and anchored in guidelines and procedures
Unger Fabrikker has organised the work on responsible business practice and sustainability in a way that ensures clear responsibility, anchoring in management and involvement across the organisation. Internal communication is a key instrument to ensure a shared understanding of expectations, roles and priorities.

The Board and the Chief Executive Officer have overall responsibility for ensuring that Unger complies with its commitments related to human rights, working conditions, the environment and business ethics. The Sustainability Manger is responsible for targets in the sustainability strategy and has the coordinating role in Unger related to the ESG working groups. Responsibility for daily follow-up and target achievement is delegated to relevant departments. The Sustainability Manager reports directly to the Chief Executive Officer and provides overall status of Unger's sustainability work to management in quarterly status meetings. Management is also kept continuously informed of relevant matters.

In 2025, Unger has strengthened the organisation through the establishment of cross-functional ESG working groups within environment (E), social conditions (S) and governance/business conduct (G). The working groups consist of representatives from relevant disciplines, including procurement, supply chain, HSE, quality, HR and management. The groups are responsible for operationalising policies, following up measures and contributing to continuous improvement within their respective areas.

Responsibility for implementation lies in the line. This means that managers at different levels are responsible for following up requirements and expectations within their areas of responsibility, with support from the Sustainability Manager and specialist functions.

The Supply Chain Director is responsible for due diligence assessments and risk mapping related to the Transparency Act and our suppliers. Supply Chain in Unger is centralised in a separate department. The procedure is owned by the Supply Chain Director, who is part of the company's management team and reports to the Chief Executive Officer. Findings from the due diligence assessments are reported to the Sustainability Manager and the management team. Supply Chain's responsibility is limited to mapping, proposing measures and following up decided measures. It is the management team that decides final prioritisation and measures.

The importance of Unger's due diligence assessments is specified and clarified for employees through job descriptions (or similar) and work tasks
The importance of due diligence assessments is specified through clear roles and responsibilities, integration into work tasks and management systems, as well as training and internal communication. Unger does not use individual incentive schemes linked to due diligence work, but emphasises responsibility in the line, management anchoring and continuous improvement.
The sustainability work in the organisation is also continuously shared on our intranet. In addition, relevant information is shared on our website, in social media and in internal/external presentations**.**

Unger ensures that relevant employees have sufficient competence to carry out the work on due diligence assessments
Unger has dedicated resources responsible for updated knowledge through cross-functional working groups, relevant networks and collaboration. The Supply Chain Director ensures the involvement of relevant resources, together with the Sustainability Manager, for relevant procedures, risk assessments and policies related to due diligence assessments**.**

Plans and resources

Does Unger ensure that the work is anchored in strategies and action plans?
Unger's commitments to respect people, society, animals and the environment are anchored in the company's overall strategy, sustainability strategy and concrete action plans, with clear prioritisation of areas where risk and impact are assessed as greatest. More information about all of this can be found in **Unger Sustainability Report 2025**.

Concrete anchoringI

- **In the overall strategy** Sustainability is one of three strategic main areas in Unger's strategy, together with value creation and competence. Commitments to responsible operations and respect for people and the environment are thereby integrated in the company's long-term goals and priorities.
- **In Unger's sustainability strategy** which is structured around three pillars**: Climate footprint, Respect for people and Innovative and environmentally friendly solutions.** These pillars specify how considerations for human rights, working conditions, environment, nature and society shall be safeguarded in own operations and in the value chain.
- **In action plans and targets.** The commitments are operationalised through concrete targets and measures, including related to:
  - Reduction of greenhouse gas emissions and resource use,
  - Responsible raw material selection and supplier follow-up,
  - HSE, working environment and competence development,
  - Due diligence assessments in line with OECD guidelines.
- **In prioritisation of the value chain**
  Strategies and action plans direct particular attention towards the upstream value chain, where the risk of negative impact on people, environment and nature is greatest. This is reflected in prioritisation of raw materials, supplier requirements and certification schemes such as RSPO.

- **In follow-up and further development**
  The commitments are followed up through annual targets, reporting and revision of measures. Strategies and action plans are further developed in line with changing risk landscapes, new regulatory requirements and increased knowledge about impact in the value chain.

Strategies and plans for sustainable business practices are followed up by management and the board Strategies and action plans for sustainable business practices are followed up by management and the board through clear responsibility, fixed reporting lines and integration into governance, targets and decisions.

The role of the board The board has overall responsibility for ensuring that Unger's strategies and commitments are complied with. Sustainability is part of the board's follow-up of the company's risk, target achievement and long-term value creation, including through the consideration of sustainability reporting and material risks.

Management's responsibility and follow-up The Managing Director and the Sustainability Manager are responsible for implementation of strategies and action plans. Follow-up takes place through management meetings, governance dialogue and prioritisation of measures within climate, working conditions, supply chain and business conduct.

Operationalisation in the organisation In 2025, cross-functional ESG working groups (E, S and G) have been established led by the Sustainability Manager who reports to management. The groups follow up targets, measures and deviations within their fields and contribute to systematic follow-up and improvement.

Follow-up through management systems Strategies and plans are followed up through ISO-certified management systems (quality, environment and occupational health and safety), internal and external audits as well as annual reporting. This provides management and the board with a basis to assess progress and the need for adjustments.

Learning and further development Results from due diligence assessments, audits and reporting are actively used by management to adjust priorities and further develop strategies and action plans over time.

Cooperation with suppliers and business partners

Unger clarifies the importance of sustainable business practices in interaction with suppliers and business partners
Our general minimum criteria for suppliers are primarily expressed in our ethical guidelines for suppliers (Supplier Code of Conduct). We are working on procedures for how to ensure that the guidelines are communicated, accepted and well known to all our suppliers. We have also mapped how many of our suppliers have their own Supplier Code of Conduct that meets the requirements in our own ethical guidelines or equivalent strict standards.

Our purchasing practices recognise suppliers that demonstrate sustainable business practices, maintain good business conduct, and show development and innovation capability. These suppliers are rewarded with long-term relationships and fair business. Our communication and interaction with suppliers in this area are mainly based on publicly available information, certification criteria, self-assessment questionnaires and due diligence assessments related to people, environment and social responsibility established in suppliers' sustainability strategies and reporting.

Indicator

Share of Unger's suppliers that have accepted supplier guidelines or have equivalent own guidelines.

The share of Unger's suppliers that have a Supplier Code of Conduct satisfactory to our own guideline or stricter was in 2025 85%.

Next year's indicator will be the share of suppliers that have signed our Supplier Code of Conduct.

Experiences and changes

Unger has gained some experience from the work on sustainable business practices in the reporting year, and some changes have occurred as a result of this
In 2025, Unger Fabrikker has gained important experience related to the work on sustainable business practices, particularly regarding the value chain, data basis and internal anchoring. The experiences have contributed to adjustments in organisation, priorities and further work.

Unger has been a pioneer within sustainable development as part of the overall strategy for several years. This year, the sustainability work was further strengthened through a dedicated Sustainability Manager, establishment of ESG working groups and clearer roles and responsibilities in the organisation. The experiences have contributed to a decision to strengthen the use of external risk data tools and further develop internal procedures for supplier follow-up and documentation. The work in 2025 has contributed to a more nuanced understanding of its own maturity level, where Unger is clear on what is established practice and what is still under development.

2. Mapping of Unger's impact on people, animals, society and the environment

Mapping is about identifying Unger's risk of, and actual negative impact/harm, including in the supply chain and through business relationships. It involves first establishing an overall risk picture and then prioritising the most material risk areas for more detailed mapping and handling of findings. How we are involved in any negative impact on people, animals, society and the environment is central to determining the appropriate response and measures. Involvement of stakeholders, especially affected parties, is central to the mapping work, as well as in measures to handle the challenges in a good way.

Mapping and prioritisation

Prioritised negative impact/harm for people, animals, society and the environment
To prioritise one or more risk areas based on severity does not mean that some risks are more important than others, or that companies do not address other risks, but that what has the greatest negative impact is prioritised first. Mapping and prioritisation is a continuous process.

Prioritised risks in the value chain 2025:

Prioritised risk	Related topics	Geography
Oleochemical raw materials (palm and fatty alcohol-based input factors)	Child labour and forced labour Working conditions Environment and climate Deforestation Freedom of association	Indonesia Malaysia
Other bio-based raw materials and chemical input factors	Working conditions Health, environment and safety (HSE) Environmental impact Transparency in the supply chain	China India
Petrochemical raw materials and intermediates (LAB)	HSE in the chemical industry Working conditions Business ethics and anti-corruption Environment and climate	Germany Netherlands Belgium Spain USA South Korea
Plastic packaging (plastic, IBC, sacks and transport packaging)	Environment Resource use Waste and circularity Working conditions	Europa India

Unger Fabrikker has carried out risk-based due diligence assessments in line with OECD guidelines and the Transparency Act. Based on the mapping, risk in the value chain is particularly linked to raw material stages, where production of oleochemical and bio-based raw materials takes place in geographies with elevated risk of violations of human rights and working conditions. In addition, climate and environmental impact from raw materials and transport are identified as key risk areas, as life cycle analyses show that the majority of Unger's total climate footprint occurs upstream in the value chain. Unger works in a risk-based manner with preventive measures, including certifications, supplier requirements, dialogue, audits and systematic follow-up where the risk is assessed as highest.

Oleochemical raw materials:
We have prioritised our work on RSPO certification of our palm kernel oil. RSPO (Roundtable on Sustainable Palm Oil) is an international organisation that works for sustainable production of palm oil through strict requirements for environment, social responsibility and traceability. Certification according to the RSPO standards implies that the palm oil is produced in a way that safeguards biodiversity, protects the rights of local communities and reduces negative environmental impact. This certification provides both suppliers and customers with assurance that the palm oil follows recognised sustainable practices. Unger was the very first company in the Nordic region to be certified according to this standard back in 2015.

Other bio-based raw materials and chemical input factors

Unger works systematically to increase the share of bio-based raw materials and reduce the climate footprint in the value chain. At the same time, risks related to production conditions, health and safety and compliance with local laws and standards are assessed. Suppliers are mapped and risk-assessed through structured ESG questionnaires and external risk data. Where risks are identified, suppliers are followed up through dialogue and expectations of improvement.

Petrochemical raw materials and intermediates
Unger purchases petrochemical raw materials mainly from suppliers in Europe and North America, where regulatory frameworks for working environment, safety and environment are relatively strong. The risk is assessed as lower than for certain bio-based raw materials, but Unger still conducts due diligence assessments related to health and safety, working conditions and business ethics. At the same time, Unger works purposefully to reduce the share of petrochemical raw materials over time, including through product development and increased use of bio-based alternatives.

Plastic packaging
Unger works systematically to reduce environmental impact from packaging through increased use of recycled plastic, design for recycling and reduced material use. Packaging suppliers are mapped and risk-assessed, with main emphasis on producers in Europe, as well as certain supplier tiers outside the EU/EEA. Unger has established a dedicated packaging group that follows up requirements, tests new solutions and reports on progress, including through Plastløftet and collaboration with Grønt Punkt Norge. The work is well established but is further developed in line with new regulatory requirements and increased expectations for circularity.

Rationale for prioritised risks in the value chain
Unger Fabrikker conducts risk-based due diligence assessments to identify and prioritise risks of negative impact on human rights, working conditions, the environment and business ethics in its own operations and in the value chain. The prioritisation is based on where the risk is assessed as greatest, and where Unger has the greatest opportunity to prevent or reduce negative impact.

Unger's procedures for mapping and identifying risk
Unger conducts mapping and prioritisation of risk in the value chain in line with the OECD Guidelines for Responsible Business Conduct and the Transparency Act. The work is risk-based and takes as its starting point a full mapping of direct suppliers (Tier 1), as well as targeted assessment of indirect suppliers and raw material tiers (Tier 2 and 3) where the risk is assessed as material. Risk is identified and assessed through a combination of:

- Analysis of raw materials and input factors (type, origin and volume),
- Geographical risk assessment based on known structural challenges in different regions,
- Supplier-specific assessments of management systems, ownership structure and compliance with requirements.

Prioritisation takes place where the likelihood of negative impact and the severity of potential harm are assessed as highest, regardless of whether Unger has a direct contractual relationship with the relevant tier in the value chain. This has resulted in particular oleochemical raw materials, certain bio-based raw materials, chemical input factors and packaging being prioritised in the due diligence work.

Which parts of Unger are included in the mapping and development in the coming year
The mapping mainly covers raw materials, chemical input factors and packaging, which are assessed to constitute the most material risk areas in Unger's value chain. Own production in Fredrikstad is well covered through established management systems and certifications (ISO 9001, 14001 and 45001) and is assessed to have lower inherent risk compared with certain upstream supplier tiers.

Transport is part of the carbon accounting, but transport suppliers are not yet fully included in the due diligence assessments for social conditions. This is something we would like to address in the coming year.

How information has been collected, sources used and stakeholders involved
Information for the risk assessments has been collected from several sources to ensure as comprehensive a decision basis as possible. This includes:

- Internal data on procurement, raw material use and supplier structure,
- A detailed supplier questionnaire (Supplier Ethical Assessment). The questionnaire covers topics such as forced labour, child labour, HSE, wages and working conditions and harassment, and asks questions both about policy, management practices and actual implementation. The questionnaire is primarily used for suppliers or raw material tiers where the risk is assessed as elevated and is used as a basis for further dialogue and follow-up.
- Documentation requirements for RSPO (palm), ISO 9001/14001/45001, Supplier Code of Conduct and sustainability strategy,
- External risk data and country-specific and sector-specific analyses from ITUC, Social Hotspot and Amfori BSCI,
- Specific sources such as:
    - Corruption Perceptions Index 2024 - Transparency.org
    - World Bank Listing of Ineligible Firms and Individuals
    - https://rspo.my.site.com/Complaint/s/casetracker
    - https://etikkradet.no/tilradninger/
- Life cycle analyses cradle-to-gate (LCA) showing that the majority of Unger's total climate footprint occurs upstream in the value chain

The work is anchored in management and conducted in cooperation between sustainability, supply chain, quality and HSE. For our risk countries, we conduct an annual review of "changes in risk, latest period" using other sources such as ITUC and RSPO. Risk is updated as soon as we become aware of changes in the sector and/or country.

We work continuously to improve the data basis
To strengthen the decision basis, Unger will continue to:

- Further develop and implement the use of external risk data tools for continuous monitoring of the supply chain using Dun & Bradstreet,
- Set clearer requirements for documentation and reporting from prioritised suppliers,
- Use dialogue, certifications and audits where this is considered appropriate,
- Continuously improve the data basis in carbon accounting and LCA for better linkage between raw material selection, risk and actual impact.

The work to close information gaps is under development and will be prioritised further in line with the OECD principle of continuous improvement. We recognise that changes in environmental and geopolitical conditions are occurring at an increasing pace. This places greater demands on us for monitoring and control. The result of this will likely be that more areas may be identified in the years ahead.

3. Stop, prevent or reduce negative impact

Stopping, preventing or reducing concerns handling findings from the mapping in an appropriate way. Unger's most material negative impacts on people, animals, society and the environment are prioritised first. This does not mean that other risks are insignificant or that they are not addressed. How Unger is involved is central to determining the right measures. This involves developing and implementing plans and procedures to manage risk and may require changes to own policies and management systems. Our handling of negative impact is a crucial contribution to the UN Sustainable Development Goals.

Stop, prevent or reduce

Targets and status for the measures the company have implemented to reduce prioritised risk

	Oleochemical raw materials (palm and fatty alcohol-based input factors)
Overall objective	Unger shall reduce the risk of violations of human rights, unacceptable working conditions and negative environmental impact in the supply chains for oleochemical raw materials.
Status	Ongoing
Targets in the reporting year (2025)	1. Ensure that palm oil-based raw materials for the Nordic market are RSPO-certified and make RSPO-certified raw materials available to the rest of the market. 2. Strengthen risk-based follow-up of suppliers in geographies with elevated risk.

Describe implemented or planned measures

1. Unger uses RSPO-certified palm oil for products delivered to the Nordics, in line with its own policy, and facilitates RSPO-certified raw materials for the rest of the market.
2. Suppliers of oleochemical raw materials are covered by the Supplier Code of Conduct with requirements for human rights, working conditions and environment.
3. Risk related to raw material origin and geography is assessed as part of the due diligence assessments, and supplier dialogue is used where risk is assessed as high.

Describe actual or expected results of the measure, as well as targets and activities for the coming reporting year

1. RSPO requirements provide a documented minimum level for environment, human rights and traceability in palm oil-based value chains. The measures contribute to reduced risk of serious violations of human rights in the supply chain.
2. In the coming reporting year, Unger will continue working to strengthen the data basis, including through D&B, and structure the follow-up of prioritised suppliers, in line with a risk-based approach.

	Other bio-based raw materials and chemical input factors
Overall objective	Unger shall reduce the risk related to working conditions, HSE and lack of transparency in the

	supply chain for bio-based and chemical input factors.
Status	Ongoing
Targets in the reporting year (2025)	1. Increase the share of bio-based raw materials without increasing the risk of negative social or environmental impact. 2. Improve the overview of the risk profile in prioritised raw material categories.

Describe implemented or planned measures

1. Unger has increased the share of bio-based raw materials and uses cradle-to-gate LCA as decision support for raw material selection.
2. Suppliers of bio-based and chemical input factors are mapped and assessed based on raw material type, origin and known risk picture.
3. Requirements are set for documentation and compliance with applicable laws and standards through contractual requirements and supplier dialogue. Requirements for suppliers regarding sustainability policy and documentation of implementation in the value chain are integrated into new framework agreements.

Describe actual or expected results of the measure, as well as targets and activities for the coming reporting year

1. The measures have provided a better understanding of where risk and impact are greatest, but the information base varies between suppliers.
2. In the coming reporting year, Unger will further develop structure and tools for more systematic collection of supplier information in prioritised raw material tiers.
3. The share of bio-based raw materials increased to 66% in 2025 (progress towards the 70% target in 2030).

	Petrochemical raw materials and intermediates (LAB)
Overall objective	Unger shall ensure that the use of petrochemical raw materials takes place in a way that safeguards requirements for HSE, working conditions and business ethics, while reducing dependency on fossil raw materials over time.
Status	Established practice
Targets in the reporting year (2025)	1. Maintain a low risk profile in the supply chain for petrochemical raw materials. 2. Further reduce the share of petrochemical raw materials through product development.

Describe implemented or planned measures

1. Unger mainly purchases petrochemical raw materials from suppliers in the EU/EEA and the USA, (except for some from South Korea), where regulatory requirements for HSE and working conditions are strong.
2. Suppliers are covered by ethical guidelines and requirements for compliance with applicable legislation.
3. Product development is actively used to replace petrochemical raw materials with bio-based alternatives where technically and qualitatively possible.

Describe actual or expected results of the measure, as well as targets and activities for the coming reporting year

1. Risk related to working conditions and HSE is assessed as relatively low but is followed up as part of ordinary supplier management.
2. The work to reduce the share of petrochemical raw materials will continue in line with technological development and available alternatives.

	Plastic packaging (plastic, IBC, sacks and transport packaging)
Overall objective	Unger shall reduce environmental impact from packaging through more circular solutions and an increased share of recycled plastic, without compromising quality and safety, and ensure responsible conditions in the packaging value chain.
Status	Ongoing / established improvement work
Targets in the reporting year (2025)	1. Increase the share of recycled plastic (PCR) in packaging. 2. Improve recyclability and reduce the use of virgin plastic. 3. Systematise the packaging work in line with regulatory requirements (PPWR) and industry initiatives.

Describe implemented or planned measures

1. Unger has established a dedicated packaging group that works systematically on improving packaging solutions.
2. Several packaging solutions with recycled plastic (PCR) have been tested for quality and functionality and put into production.
3. Unger has joined Plastløftet and reports annually on measures through Grønt Punkt Norge.

Describe actual or expected results of the measure, as well as targets and activities for the coming reporting year

1. The measures have contributed to reduced use of virgin plastic and improved recyclability of packaging in 2025. 25% recycled plastic packaging has already been achieved in our finished products, (progress towards the 35% target in 2030).
2. In the coming reporting year, Unger will continue testing and implementing improved packaging solutions, as well as adapting the work to new regulatory requirements.

Other measures to manage risk of negative impact / harm

Our other sustainability work is described and reported here: https://unger.no/sustainability/

4. Monitoring of implementation and results

Monitoring of implementation and results is about measuring the effect of the systematics and our own work at each stage of the due diligence assessments and shows whether we are conducting good due diligence assessments. Unger must have systematics and procedures in place to be able to capture and critically assess its own conclusions, prioritisation and measures taken as part of due diligence assessments. The experience gained from the work on due diligence assessments is used to improve processes and results in the future.

Monitoring and evaluation

Unger Fabrikker has established clear roles and structures to monitor the effect of measures and evaluate the work with due diligence assessments. Follow-up takes place through line responsibility, cross-functional structures and management-anchored processes.

Who is responsible for monitoring the effect and results

Who is responsible

- Functional managers are responsible for follow-up of measures within their respective areas of responsibility.
- The Sustainability Manager has a strategic and operational responsibility for collecting, structuring and following up the status of measures across the company. As well as leading cross-functional ESG working groups (E, S and G) that contribute to professional assessment of progress and effects within their areas.

How monitoring is carried out in practice

- Measures are followed up through ordinary governance processes, including management meetings, professional meetings and reporting in the line.
- Status and progress are assessed based on defined targets, risk picture and available data (e.g. supplier follow-up, LCA, carbon accounting, audits).
- Deviations, improvement needs and new risk assessments are escalated to management for prioritisation and further follow-up.

Who is responsible for evaluating the work with due diligence assessments

Who is responsible

- Due diligence assessments related to responsible supply chains are under the responsibility of the Supply Chain Director
- The overall responsibility for sustainability is under the responsibility of the Managing Director, and the Sustainability Manager reports to the Managing Director
- The Supply Chain Director and the Sustainability Manager jointly have responsibility for evaluating the company's implementation and work with due diligence assessments and how the evaluation is carried out in practice.

How Unger substantiates and measures the effect of measures to reduce risk

Unger Fabrikker measures and substantiates the effect of measures through established processes for carbon accounting, life cycle analyses cradle-to-gate (LCA), supplier follow-up, audits and management follow-up. The methods are adapted to the type of risk and available data basis and are actively used in prioritisation and further development of measures.

Concrete processes for measurement and substantiation of effect

1. Carbon accounting and LCA as main tools for environmental and climate risk

Unger uses annual carbon accounting and life cycle analyses (cradle-to-gate) to measure developments in greenhouse gas emissions and identify where in the value chain measures have the greatest effect. The LCA work is quality assured by a third party (NORSUS) and is used as a decision basis for:

- raw material selection and substitution,
- prioritisation of innovation projects,
- assessment of effect of changes in raw material and packaging composition.

Changes in emission levels and raw material composition over time are used to substantiate the effect of measures, even if individual causes cannot always be fully isolated.

2. Supplier follow-up and risk-based assessment in the value chain

For risks related to human rights, working conditions and business ethics, Unger uses process-based follow-up rather than direct measurement of outcomes. Effect is substantiated through:

- systematic due diligence assessments of suppliers based on raw material type, origin and known risk picture,
- requirements for supplier policy and documentation as part of the procurement process,
- use of certification schemes (e.g. RSPO) as preventive measures in high-risk supply chains,
- ongoing dialogue and follow-up where risk is assessed as high.

Changes in supplier structure, raw material origin or level of compliance are used as indicators of risk reduction.

3. Audits and management systems as control mechanisms

Unger uses ISO-based management systems (quality, environment and occupational health and safety) as a framework to monitor whether measures are followed up in practice. Internal and external audits are used to:

- check compliance with procedures and requirements,
- identify deviations and areas for improvement,
- assess whether the measures are sufficiently integrated into operations and decisions

Audit findings are used as a basis for corrective measures and further prioritisation and provide indirect information about the effect of established processes.

4. Management and ESG follow-up as an assessment of overall effect

The effect of measures is also assessed through the overall evaluation by management and the ESG working groups of:

- whether the risk picture changes over time,
- whether measures contribute to a better decision basis and more targeted efforts,
- whether identified risks are handled more systematically than before

This assessment takes place in management meetings, ESG working groups and in connection with annual reporting, and is used to adjust measures and processes going forward.

5. Communication of how negative impact/harm has been addressed

The prerequisite for good external communication about our work related to due diligence assessments for sustainable business practices is that it is based on concrete activities and results. Unger shall communicate publicly about relevant governance documents related to due diligence assessments, for example policies, guidelines, processes and activities related to identifying and handling our actual and potential negative impact on people, animals, society and the environment. The communication should include how the risk has been identified and handled, as well as what effects were achieved from the measures/activities. According to the Norwegian Transparency Act §4, Unger shall annually publish an account of due diligence assessments.

Communicate externally

Unger Fabrikker communicates with affected stakeholders through established dialogue and reporting channels, with the aim of ensuring transparency about how identified negative impact and risk are handled. The communication is adapted to the stakeholder group, type of impact and Unger's actual ability to influence. Unger communicates with affected stakeholders through supplier dialogue, internal communication, whistleblowing channels, dialogue with the local community and public reporting. Where direct dialogue is not possible, communication takes place indirectly through suppliers and cooperation in the value chain.

Overall information about the sustainability work is communicated via Unger's website and in our annual sustainability report. External stakeholders have the opportunity to get in touch via the website or social media, and inquiries are followed up by us. Where dialogue or input reveals a need for measures, this is assessed as part of Unger's ordinary follow-up.

Unger also actively participates in knowledge sharing both locally and internationally in relevant forums, networks and collaboration arenas related to sustainability, where experience is shared and input is used to further develop its own practice.

All stakeholders can reach us via our homepage, and we have published information of our Sustainability and Due Diligence Assessment. We wish to adapt the information to the stakeholder making the inquiry and respond within a reasonable time and in accordance with legislation.

6. Remediation where required

If we have identified that we have caused or contributed to harm to people, animals, society or the environment, the harm is addressed by ensuring remediation or cooperating on remediation. Remediation may involve financial compensation or compensation, a public apology, or that the harm is otherwise rectified. It also involves ensuring access to grievance mechanisms for workers and/or local communities so that they can have their case heard and handled.

Remediation

Our policy for remediation in the event of negative consequences

Where our activities cause or contribute to negative impact on people, society or the environment, we shall stop this activity, and we will seek to remedy the harm. Where the supplier is responsible for the negative impact/harm, the supplier is also responsible for remediation. This is in line with our ethical guidelines for suppliers. In the event of breaches of the ethical guidelines, we will cooperate with our supplier to develop a plan for remediation within a reasonable time.

Describe any cases of remediation in the reporting period

There have been no reported cases in 2025 where remediation was required.

Ensuring access to whistleblowing

What we do to ensure that employees and other stakeholders, especially affected workers and local communities, have access to whistleblowing channels

Internally, we have good procedures in place for reporting objectionable conditions, where everyone is encouraged to report so that we can implement measures if necessary. In addition to available information in our employee handbook about our procedures, information is regularly provided about whistleblowing procedures in connection with the review of results from employee surveys.

The same applies to the handling of any complaints from external stakeholders such as customers, neighbours, consumers, etc. Anyone can contact Unger, and information is available on our website: https://unger.no/our-team/ We are also working on establishing an external whistleblowing channel that will be easily accessible on our website.

RSPO also sets requirements for grievance mechanisms in the value chain: https://rspo.my.site.com/Complaint/s/

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