

## **BANO AS Transparency Act Declaration 2023**

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Duty to carry out due diligence in accordance with the Norwegian Transparency Act.

#### **About BANO AS**

BANO AS is a developer and supplier of bathroom solutions that helps people with reduced functional abilities to achieve optimal movement within this space.

BANO concept consist of the following pillars and solutions:

- Functionality and flexibility at all bathroom areas.
- Increase quality of life: Improved functionality in the bathroom gives senior citizens a higher degree of security and independence.
- Improved working environment: reducing strain on the caregiver.
- Height adjustable toilets and washbasins can be height adapted to all user needs.
- Bano grab bar support: strategically designed to “intuitive grab on” in case of body unbalance or lack of vision.

BANO AS has manufacturing operations located in Norway and Sales and Support organizations in West Europe.

A stable and reliable supply chain contributes to our long-term success.

#### **Company approach and principles**

BANO acknowledges the responsibility to respect human rights and decent working conditions. These principles are embedded in the document Bano Group code of Ethics and Business conduct. Suppliers and business partners are encouraged to comply with these standards.

#### **Codes and policies**

BANO Group Code of Ethics and Business conduct is the framework that defines the basic principles and policies are in force to monitor compliance with these policies.

#### **Risk assesment summary**

BANO conducts due diligence assessment as required by the Norwegian law LOV-2021-06-18-99 Transparency Act, the main risks are to be in supply of products and services.

Risk Categories i Supply chain are identified as per below table covering the products and services.

Risk categories Supply Chain				
Risk Level	Negligible	Minor	Moderate	High
Criteria	Off the shelf products and Services Multiple suppliers available Sourced from Nordic company/wholesaler	Off the shelf products and Services Multiple suppliers available Sourced from EUR/EEA region countries	All products and Services Sourced outside EUR/EEA region countries	Products considered as raw material direct from country of origin. Services any compliance risk. Sources from high-risk countries (sanctioned or concerns about
Supporting Services /Services (but not limited to:)	Consultants Technical Engineers ICT related Travel Transportation Supportive consultants Technical Support			Consultants or representatives
Components (but not limited to:)	Components Sub-assemblies Packaging Office Supplies PP kits Tools Consumables Production machines			Raw Materials

Risk Criteria based on region		
Region	Risk Profile	Notes
Sanctioned	High	Source: <a href="https://sanctionsmap.eu">https://sanctionsmap.eu</a>
	High	Source: <a href="https://worldpopulationreview.com/country-rankings/freedom-index-by-country">https://worldpopulationreview.com/country-rankings/freedom-index-by-country</a>
Outside Europe European Economic Area	Moderate	Source: <a href="https://www.oecd.org/trade/topics/export-credits/arrangement-and-sector-understandings/financing-terms-and-conditions/country-risk-classification/">https://www.oecd.org/trade/topics/export-credits/arrangement-and-sector-understandings/financing-terms-and-conditions/country-risk-classification/</a>
Europe/European Economic Area	Minor	
Nordic Region	Minor	
Norway	Negligible	

With the current supply chain and the products or services purchased the highest risk exposure is moderate, because the majority of the suppliers are based in the Nordic region.

No raw materials are purchased by BANO AS and Products and Services are purchased from suppliers with a proven track record and known history.

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Some suppliers produce components based on Bano AS's specifications, but the majority of BANO AS's suppliers deliver components/ products from their standard product ranges. For services purchased by Bano AS, the scope of these services is always very specialized and purchased from Norwegian or West European companies. The highest risk level is considered as Negligible.

In the due dilligence process, all Moderate risk profile categorized suppliers will be prioritized and will be asked to confirm compliance with Bano Code of Ethics and Business Conduct.  
*100% of these category confirmed compliance in writing.*

Assessment of the other categories will be conducted continuously. Such assessment can either consist of reviewing suppliers published compliance documents or alternatively request compliance in writing.

### **More information**

Upon written request, everyone has the right to information from BANO how BANO addresses actual and potential adverse impacts pursuant.

Please send request to: Email: [compliance@bano.no](mailto:compliance@bano.no)

This summarized due-diligence report shall be updated and published no later than 30 June of each year and otherwise in case of significant changes to the enterprise's risk assessments.