

List of Signatures

Page 1/1



4 Transparency Act Midgard Infra.pdf

Name	Method	Signed at
Vestvik, Ingrid	BANKID	2026-06-28 16:17 GMT+02
Ims, Svein Arild	BANKID	2026-06-28 16:40 GMT+02



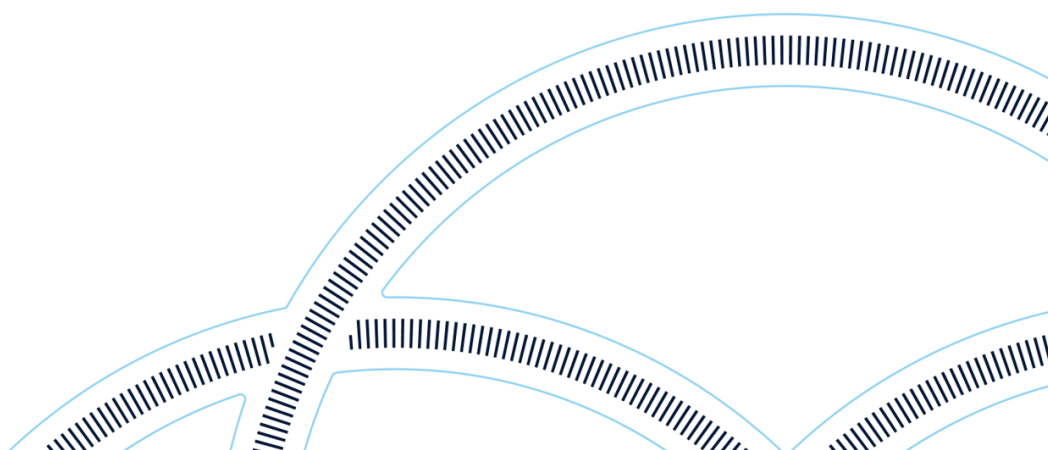
This file is sealed with a digital signature. The seal is a guarantee for the authenticity of the document.

External reference: B9D5F38D338F4E2E8297F51483CCF2C0

Midgard Infra AS

Statement on the Transparency Act

2025



This file is sealed with a digital signature.
The seal is a guarantee for the authenticity
of the document.

Document ID:
B9D5F38D338F4E2E8297F51483CCF2C0

Statement on the Transparency Act – Midgard Infra

Organization, area of operation, policies and procedures for dealing with actual and potential negative consequences for fundamental human rights and decent working conditions.

Until 1 October 2025, Midgard Infra was a wholly owned subsidiary of the Lyse Group. Subsequently, the ownership was divided between Lyse and Hitec Vision. The handling of the Transparency Act has largely been reflected in the Lyse Group's routines in 2025. From October, Midgard Infra has taken over this responsibility fully.

Midgard Infra establish fiber optic connections that connect Norway to important European destinations. This means providing infrastructure that enables fast and stable data transfer over long distances, which is essential for modern business operations and communications.

Midgard Infra has established high-capacity digital highways connecting Norway to Europe, enabling international service providers, data center providers, and hyperscalers to move their operations to Norway to take advantage of a range of efficiency, sustainability benefits unique to Norway.

In addition to being a customer-oriented, competitive player and attractive partner, Midgard Infra builds and maintains fiber infrastructure and provides reliable and efficient data transmission services. For Midgard Infra, the most commonly used procurement categories (main categories) in 2025 are building and construction and telecommunications.

Midgard Infra works continuously to ensure responsible business practices in its own operations and in its value chains. A well-functioning business community is an important contribution to achieve the UN's Sustainable Development Goals, and as a business player, Midgard Infra will contribute to ensuring long-term value creation in its own operations and in our supply chains.

The purpose of the Transparency Act - to promote respect for fundamental human rights and decent working conditions - coincides with our values of taking social responsibility and having sustainable business operations that respect human and labor rights, society and the environment. The fact that Midgard Infra will contribute to a sustainable working life is part of the strategy.

Midgard Infra is subject to the Transparency Act and this statement, which has been prepared in accordance with Section 5 of the Transparency Act, will be published so that it is easily accessible.



This file is sealed with a digital signature.
The seal is a guarantee for the authenticity
of the document.

Document ID:
B9D5F38D338F4E2E8297F51483CCF2C0

Until October 2025, Lyse's corporate legal team has followed up compliance with the Transparency Act, while Group Procurement has had the overall responsibility for supplier follow-up. Due diligence assessments have been carried out on behalf of Midgard Infra, and in this connection, priority is given to the follow-up of suppliers in areas where there is a significant risk of violations of human rights and decent working conditions.

To promote respect for fundamental human rights and decent working conditions, clear guidelines have been established regarding workers in the value chain. Through the Lyse Group's guidelines for corporate governance and execution of these, it is established that we shall have responsible business operations by safeguarding human and labor rights, society and the environment. The Lyse Group's Code of Conduct sets out clear requirements for personal conduct and clarifies the expectation that the work will be carried out in a responsible and ethical manner. The business must be run in such a way that it respects human rights and ensures good working conditions, both in its own organization and with suppliers and partners. Employees are obliged to notify Lyse Group Procurement in the event of suspected non-conformities related to human rights and decent working conditions at suppliers and business associates. All employees have completed annual e-learning courses on the Code of Conduct, which helps to ensure communication and compliance with the Code of Conduct.

The Lyse Group's governing principles for procurement, which have been adopted by Lyse's Board of Directors, have also established guidelines to ensure a sustainable value chain. These principles apply to all activities that are intended to meet a need for goods, services or building and construction work.

Midgard Infra's suppliers must confirm the supplier's declaration, which includes requirements for health, environment, safety, climate, human and labour rights and business ethics. In 2025, a duty to notify will be included in the supplier's declaration if public authorities, such as the police, the Norwegian Labor Inspection Authority or the Norwegian Tax Administration, impose an order or prohibition on the supplier. The duty to notify also applies if the suppliers become aware of a negative impact on fundamental human rights and decent working conditions in relation to the goods or services delivered to Midgard Infra.

In high-risk industries, such as construction and cleaning, seriousness regulations are used to counteract work-related crime. In addition, separate contract terms are used to promote fundamental human rights and decent working conditions, with specific duties and sanctions.

The Lyse Group's guidelines for reporting censurable conditions are published easily accessible on the Group's intranet, and all employees have had access to these throughout 2025. All employees in Midgard Infra have the right, and in some cases a



This file is sealed with a digital signature.
The seal is a guarantee for the authenticity
of the document.

Document ID:
B9D5F38D338F4E2E8297F51483CCF2C0

duty, to report any censurable conditions. Consultants who carry out assignments for Midgard Infra are also encouraged to report any censurable conditions.

Follow-up of suppliers is prioritized based on where the risk to fundamental human rights and decent working conditions is considered to be greatest. We also look to our opportunity to influence. Supplier follow-up is carried out through EcoVadis, the Achilles UNCE qualification scheme or by group procurements in Lyse carrying out due diligence assessments of selected suppliers.

Through EcoVadis, sustainability assessments of corporate social responsibility (CSR) are carried out based on international standards in the areas of:

- Environment
- Ethics
- Social responsibility
- Procurements

This gives us insight into supplier risks and a basis for structuring supplier follow-up. EcoVadis also has a news module that identifies and evaluates news stories about the suppliers in the aforementioned areas.

EcoVadis is used as a tool for risk screening and assessment of suppliers' sustainability work, and some suppliers to Midgard Infra have implemented corrective measures through EcoVadis in 2025.

In EcoVadis, a general risk assessment is carried out of all the company's suppliers, in addition to a more detailed documentation review for selected suppliers. For the suppliers in Midgard Infra's portfolio where only a general risk assessment has been carried out, most suppliers have a "low" overall risk, but several companies also have a "very low" risk assessment. However, some companies have a risk assessment of "medium low", and a few are assessed as having "medium high" or "high" overall risk.

Among the suppliers who have carried out a documentation review through EcoVadis, the vast majority are considered to have "low" overall risk, but there are also several with a risk assessment of "medium low". However, there are some suppliers that are considered to have "very low" overall risk. Only a very limited number of suppliers are assessed as having "medium" risk, and there are no suppliers with a risk assessment of "high" or "very high".

Through the Achilles UNCE qualification scheme, audits are carried out in areas such as health, safety, safety and quality (HSEQ) and ethics and labor law. The latter type of audit is particularly relevant for the follow-up of the Transparency Act. If nonconformities are discovered, an improvement plan is prepared, which the auditor is responsible for following up.



This file is sealed with a digital signature.
The seal is a guarantee for the authenticity
of the document.

Document ID:
B9D5F38D338F4E2E8297F51483CCF2C0

Within HSEQ, audits were carried out in 2025 of two companies that deliver goods or services to Midgard Infra. The audits had an average result score of 93%, and no serious deviations have been revealed.

In order to identify and assess risk at an early stage, counterparty checks are carried out on potential contractual partners and partners. For this purpose, the Dow Jones system is used, which both checks sanctions lists and identifies any negative news stories. Based on the specific risk picture, other investigations are also carried out of the potential agreement or partner.

Where relevant, inspections are also carried out of suppliers against mandatory approval registers, including the approval register for car washes, tire changes and tire hotels, the cleaning register and the register for staffing companies. These registers have been established as part of the Government's strategy against work-related crime and are maintained by the Norwegian Labor Inspection Authority.

Actual negative consequences and significant risks

It has not been revealed that Midgard Infra has caused any actual negative impact on fundamental human rights and decent working conditions, neither in its own operations nor in the supply chain. The risk of negative impact is considered to be higher in the supply chains than in the company's own operations.

In 2025, priority has been given to follow-up of suppliers in procurement categories where the risk of breaches is greatest, and where a possible breach could be of greatest severity. The priority also considers our ability to influence. Against this background, the Lyse Group followed up selected suppliers in the main category of building and construction in 2025, and carried out inspections of pay and working conditions, among other things. Within the main categories of telecommunications and logistics, information has been collected from selected suppliers to gain an overview of any breaches, risk assessments, insight into the supply chain and employees' access to whistleblowing channels. No actual violations have been reported.

A follow-up has also been made to the government's request to carry out stricter due diligence assessments to investigate whether the company has suppliers with links to the ongoing conflict between Israel and Palestine. This is an ongoing work, and relevant sources are being checked in this connection, such as the UN High Commissioner for Human Rights' overview of companies involved in activities related to Israeli settlements in occupied territory.

Based on the risk assessment made of the procurement categories used by Midgard Infra, the assessment is that the main categories building and construction and telecommunications have the highest probability of non-conformities or breaches, as well as the highest risk of serious consequences.



This file is sealed with a digital signature.
The seal is a guarantee for the authenticity
of the document.

Document ID:
B9D5F38D338F4E2E8297F51483CCF2C0

Planned or implemented measures and their results or expected results

Contributing to a sustainable working life is an overarching company goal, and work is underway to identify and update goals and KPIs that will support this. In addition, we work to continuously improve internal processes and routines to promote fundamental human rights and decent working conditions in our supply chains. The focus is on having a step-by-step approach as it is considered important to build experience and expertise. The processes are complex and time-consuming, and experience shows that suppliers show varying degrees of transparency.

In 2026, Midgard Infra will work systematically to take comprehensive and independent responsibility for compliance with the Transparency Act as we are decoupled from the Lyse Group. The areas to be covered will be identified and the responsible in the company. Below are some focus areas in 2026, in random order:

- Implement standardized requirements and criteria to promote climate, environmental and human rights considerations in procurement. The purpose is to ensure an effective integration of sustainability considerations in the procurement processes and to contribute to the coordination of requirements and criteria. This will also help to strengthen predictability for our suppliers.
- Establish a process for systematic supplier follow-up.
- Consider conducting a third-party audit for control of pay and working conditions, which is within the purpose of the Transparency Act to promote fundamental human rights and decent working conditions.
- Work on due diligence assessments of selected suppliers within prioritized risk categories, and we will communicate to our suppliers the importance of compliance with human rights and decent working conditions. The focus is on suppliers and business associates as it is considered that the risk is greatest in these stages, but we will also consider appropriate measures to prevent any negative impact on fundamental human rights and decent working conditions through subsequent stages.
- Based on the overall risk assessment, contractors in the building and construction sector will be prioritized in particular for follow-up. The construction industry is considered to be particularly at risk due to extensive use of subcontractors, a high proportion of hired labor and repeated government findings of work-related crime.



This file is sealed with a digital signature.
The seal is a guarantee for the authenticity
of the document.

Document ID:
B9D5F38D338F4E2E8297F51483CCF2C0

Other relevant reports

For more information about Midgard Infra's responsible business practices, please refer to the following reports:

- Midgard Infra's annual report.
- Lyse's sustainability reporting in accordance with Lyse. CSRD reporting, which appears in a separate chapter in the annual report of the Lyse Group (available at www.lysekonsern.no). See in particular the reporting for ESRS S2
- The reporting for the Lyse Group's Activity and Reporting Obligation (ARP) (available at www.lysekonsern.no)



This file is sealed with a digital signature.
The seal is a guarantee for the authenticity
of the document.

Document ID:
B9D5F38D338F4E2E8297F51483CCF2C0