



The Transparency Act Report 2024

Eirawater AS

06.03.2025

The Transparency Act Report

Last approved date 22/07/2025 (Igor Soldo)**Last revision date**

09/07/2025

Next revision date

09/07/2026

Document responsible

Roy Andreassen

1. The Company's Report according to The Transparency Act

1.1 Introduction

Eirawater AS shall carry out due diligence assessments every year in accordance with the Transparency Act and publish an account of the assessments.

Promoting a company's respect for fundamental human rights, and safe and decent working conditions is the main purpose of the Transparency Act.

This report includes the company's duty to account for the due diligence assessments the Company has implemented in 2024. In the report, the Company also explains the measures that are assessed and implemented to reduce the risk of negative consequences for the Company's activity and business relationships can have for basic human rights, and safe and decent working conditions.

1.2 Contact information

Eirawater AS is obligated to respond to any request regarding information about The Transparency Act, human rights and/or working conditions. Eirawater has not received any such enquiries in 2024. Any enquiries about this report can be addressed to:

General Manager

Roy Andreassen

roy@eirawater.com

or

QA Manager

Igor Soldo

igor@eirawater.com

1.3 Obligation to report

The Company's main office and production facility is in Naustevegen 123, 6470 Eresfjord, Norway.

The Company is a Private Limited Company (AS) and is required to report according to the Transparency Act.

The Company has at balance sheet date (31.12.2024), sales income of 237.022.522NOK and a balance sum of 337.346.668NOK.

2. Company's operations

2.1 Company's organisation and operating area

Eirawater AS (the "Company") is a Norwegian company with its main office and production facility located in Eresfjord, Norway. The Company is majority owned by Eden Global Investments Ltd, a private investment company registered within the Dubai International Financial Centre in the United Arab Emirates. The Company also has a branch office in Dubai, UAE. The Company produces bottled natural mineral and carbonated water from the Eira source.

The facility has the capacity to produce several thousand bottles per day. The production facility is run by green energy provided by a nearby water plant.

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The management team with General Manager is located in the Eresfjord production facility, with total of 30 employees. The Company CEO is located in the Dubai office, with a total of 13 employees.

The General Manager reports to CEO, while the Management Group reports to the General Manager. All other staff report to their closest leader based on a line-organised structure.

2.2 Internal guidelines

Eirawater AS is committed to follow strong ethical standards in our business conduct. Eirawater AS follows current applicable laws and regulations and acts in a manner that covered by our Ethics Policy.

2.3 Value chain

The main raw materials for Eirawater As are natural mineral water from the Eira source, glass and PET bottles, aluminium and PET caps, and packaging materials such as cardboard and plastic film. Eirawater AS purchases materials from countries where risk for breach of human rights and decent working conditions is medium to high. Transport of materials and products is externally provided.

2.4 Future goals

Eirawater AS has set certain goals for the coming years:

- Develop the Due Diligence Assessment based on current and new experience
- Develop the competence internally within Eirawater AS regarding sustainability, human rights and purchasing practice.

3. Due Diligence Assessment

Due diligence process is a continuous process to help businesses identify risks associated with human rights and worker rights, with the goal to stop, prevent or reduce these risks.

Due diligence assessment is an important element of responsible intranational business conduct. This is also a central theme in the internationally approved OECD six main principles and FN's ten guidance principles (UNGPs). Eirawater AS Due diligence assessment follows both principles.

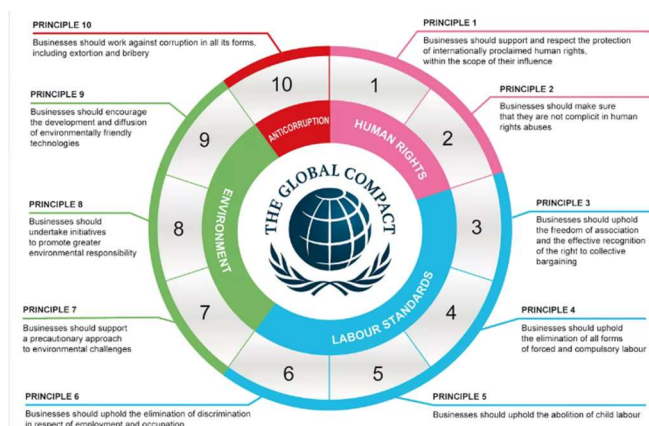


Figure 1 UNGPs

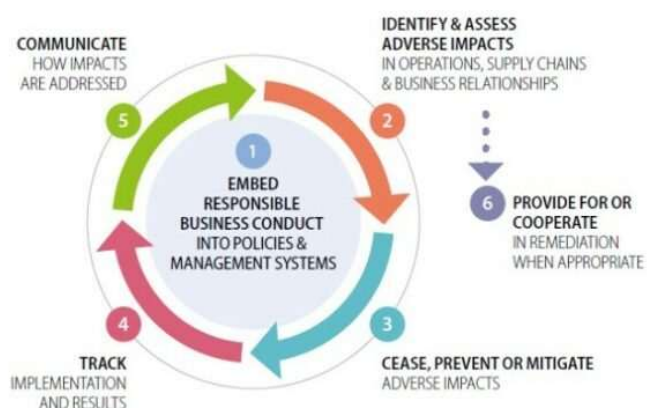


Figure 2 OECD six main principles

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3.1 External conditions

Eirawater AS procures certain raw materials from China. China is regarded as a risk country by BSCI, meaning there is an elevated risk of unethical working conditions. To negate the risk, having a social certificate such as Sedex or BSCI is a requirement for suppliers from risk countries.

All suppliers are also required to fill out and sign Supplier self-assessment document, which contains a part about human rights and decent working conditions.

Our Nordic and European suppliers are generally assessed as low risk regarding violations of human rights and decent work conditions; however, violations may occur. Therefore, a good dialogue with our Nordic and European suppliers is important.

3.1.1 Findings external conditions

There have been no findings of violations regarding external conditions.

3.2 Internal conditions

When it comes to the welfare of Eirawater's own employees, including human rights and decent working conditions, this is covered by Code of Conduct, which are Eirawater's ethical guidelines. The CoC defines the ethical standards and values that Eirawater AS expects of all our employees, leaders, board members and business partners. It covers themes such as, but not limited to, anti-corruption, anti-discrimination, HSE, union membership, pay, etc. All employees shall read and sign the CoC.

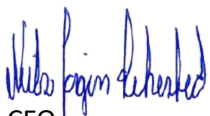
Other important measures is a good relationship and a good dialogue with local unions, implementation of regular employee interviews and employee surveys, and regular general meetings with all employees (allmøte).

All employees working at Eirawater AS have a written work contract and have a collective pay agreement. All sick leave, accidents and other absence is documented.

3.2.1 Findings internal conditions

There have been no findings of violations regarding internal conditions.

Signatures:



CEO

Nils Jørgen Sehested



COO

Steven Cozens