

## BOSTON GROUP – TRANSPARENCY ACT ACCOUNT

### INTRODUCTION

Boston AS (“Boston Group”) is committed to the protection of internationally recognised human rights and fair and ethical work practices. The company complies with all applicable laws and regulations, including the Norwegian Transparency Act. The Transparency Act shall promote enterprises’ respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure the public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions. The act imposes three main obligations on companies: a duty to carry out due diligence in accordance with the guidelines from OECD, a duty to account for due diligence and a duty to answer information requests. About the account This account has been prepared in accordance with the Transparency Act. It summarises Boston Group’s governance, policies, and procedures regarding the protection of human rights and decent working conditions, as well as risk identified in the due diligence assessment and measures to mitigate these risks. Boston Nordic Group and four subsidiaries are covered by the act’s obligations: Boston Group AS, Boston Group A/S, Boston Group AB and Boston Group OY. Nordic Warehouse Solution A/S is not affected by the act directly, but as all activities in Boston Group are to be assessed, they are included in the group due diligence assessments.

### ABOUT BOSTON GROUP

Boston Group a consumer electronic wholesales and distribution company in the Nordic area and offers its customers one of the market’s broadest selections of consumer electronics and business solutions. The group operates an efficient and scalable business model and is widely recognised for having an industry leading cost position. The group is serving customers in the B2B and distribution segments.

Boston B2B is a player vis the biggest dealers for corporate customers in the Nordics focusing on the large and medium sized enterprises segments. The group employed an average of 35 employees throughout the year 2022. Boston Nordic Group is headquartered in Farum, Denmark.

Commitment to human rights and decent working conditions. To ensure commitment to the highest standards of business ethics, Boston Group has incorporated sustainability into the strategy, business model and governance policies. Respect for fundamental human rights and decent working conditions is a central part of sustainability at Boston Group and the subsidiaries. The group will continue to focus the efforts on increasing transparency and overview at all stages of the supply chains to safeguard the people who are impacted by the business. Boston Group is currently working on increasing due diligence on human rights and decent working conditions in the supply chains. To secure the necessary progress, the group has engaged external consultants to assist in the establishment of risk assessments and new procedures. The group commitments apply to all subsidiaries and private labels.

### GOVERNANCE OF HUMAN RIGHTS AND DECENT WORKING CONDITIONS

Responsibilities In Boston Group, sustainability permeates all operations and the organisational structure, from top-level board and management to all levels of the organisation. The board of directors has been informed of the Transparency Act and the duties connected to the law. The CEO of the group is responsible

for the group and the subsidiaries complying with the duties as set out in the act. The CFO of the group is involved in overseeing these efforts and has the ultimate responsibility for corporate governance, including the oversight of strategic planning, review of strategic processes and sustainability reporting. The director legal & compliance of the group has the operational responsibility that the group conduct due diligence on human rights and decent working conditions. This is done in collaboration with the subsidiaries. Each subsidiary has the responsibility to make sure due diligence and supplier assessments on human rights and decent working conditions is conducted in line with the act and the OECD guidelines. For more information about responsibilities in the subsidiaries, please see the accounts in the appendix. Policies and governing documents Each subsidiary within Boston Group shall have a separate internal Code of Conduct, which describes its commitment to maintaining high ethical standards in line with the group's overall ambition. Across all our subsidiaries Boston Group wants to work with suppliers that share the company's values and requirements regarding responsible business conduct. At Boston, a Code of Conduct is going forward signed as part of the supplier agreement. In 2022, no major breaches of the subsidiaries' Code of Conducts were reported. Whistleblowing Boston Group's employees are encouraged to report any misconduct related to the company by using the available whistleblower channels. Whistleblower reports are handled in accordance with established whistleblower programs and reporting concerns can relate to any area, including human and labour rights. Reports of misconduct are handled by a whistleblower group in each subsidiary. All reported concerns are investigated to identify root causes and evaluate corrective and preventive actions, including the potential involvement of relevant authorities, while maintaining the confidentiality of reports in accordance with relevant jurisdiction. To enable anonymous reporting, the group aims to have an anonymous whistleblower channel in each subsidiary, managed by independent third parties. In 2022, no report was made through available whistleblower channels.

#### DUE DILIGENCE WITH RESPECT TO HUMAN RIGHTS AND DECENT WORKING CONDITIONS

Boston Group values transparency as a key component to ensure that the products sold are of high quality and are manufactured in safe conditions with no violations of human and labour rights. The group aims to implement risk-based supply chain mapping throughout all subsidiaries to identify potential risks and ensure compliance with commitments and standards during 2023. No screening on products besides private label was conducted. To strengthen the work on human and labour rights, Boston Group aims for all its subsidiaries to implement procedures and report on their performance in due diligence in line with the OECD guidelines and the Transparency Act during 2023. Due diligence assessment Through supervised workshops in May 2023, Boston Group and each of the subsidiaries conducted a strategic due diligence assessment in accordance with the requirements of the Transparency Act. The assessment was based on a methodology for risk management, with the aim to identify and prioritise risk related to the company's ability to promote and protect human rights and decent working conditions. In the assessment, the group and subsidiaries looked at risks associated with its own operations, business partners and supply chains. Key employees with insight into the value chain and procurement processes participated, and both internal and external risk was covered. Based on the risk assessment conducted by the subsidiaries, Boston Group has identified the following risks at group level: Internal risk: For Boston Group the fact that due diligence and supplier assessment on human rights and decent working conditions are not done according to the guidelines from OECD is identified as a severe risk. Further, upskilling, resources and system support are required, and this is contributing to the risk as it makes it challenging to carry out due diligence and supplier assessments accordingly. A consequence of this is limited transparency and knowledge about the potential risk in the supply chains. As for the company's own operations, a relevant risk is health and safety for

employees in warehouses and offices. However, the risk is considered to be low due to strict regulations for health and safety in the workplace as well as workers' rights in general. External risk: For Boston Group the identified external factor of most severe risk is the use of minerals in for example microchips and computers. Activities includes the extraction, transport, handling, trading, processing, smelting, refining and alloying of the raw materials. These minerals are defined by OECD as highrisk raw materials, when sourced from a conflict-affected and high-risk areas identified by the presence of armed conflict, widespread violence or other risks of harm to people. As these minerals are part of the first-tier suppliers' supply chains, Boston Group has limited insight and impact on the sourcing of the minerals. However, due to the severeness, the group has identified it as a risk area to keep an eye on going forward. Further, the groups supply chains are of high complexity, which may increase the risk of violation of human rights and decent working conditions both in production and distribution. Regarding some products there is a risk factor that these are produced in China and that there is no transparency, assessments or control beyond first-tier suppliers.

#### TRANSPARENCY ACT ACCOUNT 2022 MITIGATION OF RISK

Based on the risk assessment, Boston Group has not identified actual negative impacts on fundamental human rights and decent working conditions linked to the company's own operations, the supply chains and business partners. The company has identified the following measures to manage potential negative impacts: X Develop routines, checklists and other governing documents for due diligence and assessments of suppliers at group level. X Assess the need for resources and competence. X Assess the need for system support. X Establish a plan for competence development on duties in the act, human rights and decent working conditions and supplier assessments. X Increase knowledge and carry out risk assessment of the use of conflict minerals in products provided. X Risk mapping of countries, products, and raw materials. X Screening and risk prioritisation of suppliers. Carry out in-depth assessments of suppliers based on risk profile. X Establish systems and routines for assessment of first-tier suppliers through self-assessment /questionnaires. X Increase knowledge and start to carry out self-assessment questioners of subcontractors of private label. Through implementing these measures, Boston Group and the subsidiaries will establish a clear overview of all risks related to human rights and decent working conditions. Further, measures will contribute to monitor potential risk and adverse impact that might occur in the supply chains.

#### DUTY TO PROVIDE INFORMATION

In the reporting year the group and subsidiaries have handled information requests regarding products and services accordingly to the duty to provide information.