

## **Transparency Act Statement 2025**

### **Account of Due Diligence Assessments**

**Company:** OPCOM AS

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**Reporting Period:** 1 January 2025 – 31 December 2025

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## **Transparency Act Section 5a**

General description of the company's organization, operations, policies and procedures for handling potential and actual adverse impacts on fundamental human rights and decent working conditions

### **Organization**

OPCOM AS is a Norwegian limited liability company headquartered in Norway, operating within industrial telecommunications infrastructure, indoor mobile coverage solutions and electrical services.

The company primarily utilizes its own personnel and works with selected suppliers and subcontractors who are subject to qualification and follow-up processes.

Responsibility for the company's work related to the Norwegian Transparency Act and responsible business conduct is anchored in executive management. Operational follow-up is performed through line management and internal governance systems.

OPCOM AS operates with structured management systems and internal controls supporting quality management, supplier evaluation and compliance monitoring.

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## Scope of Operations

OPCOM AS provides services including:

- Deployment and maintenance of mobile telecommunications infrastructure
- Indoor mobile coverage systems (DAS and repeater solutions)
- Electrical and technical installation services

The company operates both as a main contractor and subcontractor for telecommunications infrastructure and technical installations.

OPCOM AS does not directly import raw materials but procures technical equipment and components from national and international suppliers.

## Policies and Procedures

OPCOM AS has established internal procedures for due diligence assessments in line with the **OECD Guidelines for Multinational Enterprises** and the **Norwegian Transparency Act**.

These procedures include:

- Mapping of relevant supplier chains
- Risk assessment of key suppliers and subcontractors
- Follow-up of wage and working conditions among subcontractors
- Contractual documentation requirements
- Risk mitigation and corrective actions when necessary
- Handling of transparency and information requests

Supplier contracts and cooperation agreements include requirements regarding:

- Compliance with applicable labour legislation
  - Documentation of wage and working conditions
  - Compliance with health, safety and working environment regulations
  - Cooperation in audits or documentation requests where required
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## Transparency Act Section 5b

Information regarding actual adverse impacts and significant risks identified through due diligence assessments

### Own Operations

Within the company's own operations, the risk of violations of fundamental human rights is considered **low**. Operations are primarily conducted in Norway and are therefore subject to Norwegian labour legislation and regulatory oversight.

Potential risk areas may include:

- Use of temporary labour
- Engagement of subcontractors

During the reporting period, **no actual violations of human rights or decent working conditions have been identified within the company's own operations.**

### Supply Chain

OPCOM AS works with suppliers within the following categories:

- Telecommunications equipment
- Electrical components
- IT and system services
- Transport and logistics
- Technical subcontractors

Most key suppliers are Norwegian companies or established international suppliers with existing compliance frameworks.

Risk assessments indicate:

- **Low risk** among Norwegian suppliers
- **Low to moderate risk** among European suppliers
- **Moderate potential risk** in certain global supply chains for technical components (for example electronics originating outside the EU)

No actual adverse impacts related to human rights or labour conditions have been identified during the reporting period.

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## Transparency Act Section 5c

Measures implemented or planned to prevent or mitigate potential adverse impacts

### Measures Implemented During 2025

During 2025 OPCOM AS has:

- Mapped and categorized key suppliers based on risk exposure
- Collected compliance documentation from key suppliers
- Introduced ethical and compliance expectations in new supplier contracts
- Integrated supplier evaluation within internal management processes
- Clarified internal responsibilities for compliance follow-up

When subcontractors are engaged in Norway, verification may include review of:

- HSE identification cards
- Employment contracts
- Wage documentation
- Timesheets and working hour records

### Planned Measures

During 2026 OPCOM AS will:

- Establish a formal **Supplier Code of Conduct**
- Implement structured periodic supplier evaluations for prioritized suppliers
- Strengthen documentation requirements related to procurement of technical equipment
- Establish a formal grievance and reporting channel for ethical or compliance concerns
- Publish and update the Transparency Act statement annually

These measures are expected to:

- Reduce risk within the supplier chain
  - Improve traceability and transparency
  - Strengthen documentation and governance practices
  - Support compliance requirements in public procurement and customer qualification processes
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## Summary

OPCOM AS has conducted due diligence assessments in accordance with the Norwegian Transparency Act for the reporting period **2025**.

No actual violations of fundamental human rights or decent working conditions have been identified during the reporting period.

The overall risk level is assessed as **low to moderate**, with particular attention given to global supply chains related to technical equipment.

The work is anchored in company management and integrated into the company's governance and operational management practices.



**Ole-Petter Landewall**

**CEO – OPCOM AS**

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