

The Transparency Act – 2024 Account of due diligence assessments at Advokatfirmaet Simonsen Vogt Wiig AS

1 Introduction and contact

The Transparency Act entered into force on 1 July 2022, according to which Advokatfirmaet Simonsen Vogt Wiig AS (hereinafter "SVW", "we", "us" or "the firm") is required to carry out due diligence assessments on fundamental human rights and decent working conditions in our own operations, in our supply chain and with our other business partners. This report includes due diligence assessments for the period 1 January to 31 December 2024.

If you have any questions about the report or other questions related to the Transparency Act, including inquiries under the right to information in Section 6, please contact post@svw.no.

2 Company organisation

SVW provides business law services and has in 2024 practiced law from offices in Oslo, Bergen, Stavanger and Tromsø. In addition, SVW has run legal practice through a subsidiary in Singapore. As per 31 December 2025, the company owned 100% of the shares in Simonsen Vogt & Wiig Services Pte. Ltd.

SVW cooperates closely with the Advokatfirmaet Simonsen Vogt Wiig Kristiansand DA in Kristiansand and Advokatfirmaet Simonsen Vogt Wiig Trondheim AS in Trondheim, but it has no ownership interests in these companies. This account therefore only applies to Advokatfirmaet Simonsen Vogt Wiig AS and Simonsen Vogt & Wiig Services Pte. Ltd.

The main responsibility for follow-up and compliance with the Transparency Act lies with the HR manager in SVW. This involves checking that SVW complies with the Transparency Act, including that due diligence assessments are carried out and published in accordance with Sections 4 and 5 of the Act.

3 Guidelines and due diligence assessment routines

The firm has adopted ethical guidelines for responsible business conduct and actively adheres to the OECD Due Diligence Guide for Responsible Business Conduct and other relevant sector-specific guidelines for responsible supply chains. According to these principles, the industry has a responsibility to respect human rights. In addition to basic principles of legal ethics and the requirements set out in the Transparency Act, SVW must comply with the UN Guiding Principles on Business and Human Rights. SVW, its lawyers and employees, will respect human rights in accordance with the UN Guiding Principles and is an active partner for our clients in the work to ensure respect for human rights and decent working conditions.

We support work to promote human rights, including through our outward, voluntary activities and pro bono work.

SVW's clients and partners shall be confident that products and services offered by SVW do not entail negative consequences for fundamental human rights and decent working conditions. To ensure this, we have purchasing routines that ensure that there will be a screening of all new suppliers. For suppliers in vulnerable and/or sector-specific industries and areas, as part of these procurement routines, additional requirements are set for the supplier's documentation for compliance with the Transparency Act. Our company handbook contains an internal code of ethics, our employee handbook

(incl. HSE) covers the area "Transparency and ESG" and in addition, this is included in our introduction program for new employees.

4 Actual and potential negative consequences and risks

The assessments related to SVW's own core business indicate that our legal practice does not entail a risk of adverse effects on our 230 employees' human rights and decent working conditions. Last year's sickness absence in our company was 4.33%, and we conducted a survey in connection with moving to new premises. We are committed to ensuring a good working environment. We have a whistleblowing channel for reporting censurable conditions and have not received any notifications for the period to which this report applies.

In assessing potential negative consequences in the supply chain, we have paid particular attention to the following risk factors:

- Country of origin of products, especially if production takes place in low-cost countries outside the EEA with known challenges related to labour rights.
- Product types with high inherent risk, including electronic equipment (e.g. monitors, PCs, mobile phones), office furniture and textiles, which are often part of global supply chains.
- The use of subcontractors, especially when the first link in the supply chain is Norwegian, but purchasing or production takes place abroad through several links.
- Lack of or insufficient documentation of the supplier's own due diligence or ESG procedures.

5 Effectuated and planned measures

5.1 General approach

In line with identified risk factors, our efforts to conduct due diligence in accordance with the Transparency Act are therefore primarily focused on our supply chain and our business partners.

SVW's compliance officer has conducted a review of SVW's supplier list to identify suppliers that potentially represent a risk.

5.2 Applied due diligence assessment method

The Company conducts due diligence assessments in line with the OECD Model for Responsible Business Conduct, which consists of six steps. The assessments take place as part of our annual review of suppliers and business partners, and are anchored in an interdisciplinary collaboration between the compliance manager, HR and purchasing manager.

The work inter alia involves:

- Identification and mapping of suppliers and contractors based on turnover, sector and country of origin of goods or services.
- Obtaining and assessing the supplier's own policies, procedures and any third-party documentation related to human rights and decent work.
- Application of questionnaires to obtain confirmation from suppliers that they meet key requirements, including for their own due diligence and follow-up of subcontractors.
- Qualitative assessment of risk based on publicly available information and known risk factors for the relevant industries.

The review is documented and updated annually, and the assessments form part of the Company's ESG work and internal compliance reporting. If necessary, follow-up is also carried out with individual suppliers.

5.3 Limitation and selection of suppliers

The company has a significant number of suppliers, and in 2024 we made purchases for less than NOK 150,000 from the majority of these.

When reviewing the supply chain, we have had a particular focus on suppliers where we made purchases for more than NOK 500,000 and where we have the greatest influence (29 suppliers used since 2023 and 16 new suppliers in 2024, a total of 45 suppliers for 2024).

5.4 Supplier requirements

The said suppliers have received our Responsible Business Conduct Principles that apply to SVW. In addition, they have received a questionnaire listing a number of requirements that the suppliers are required to satisfy and confirm in writing.

6 Result of due diligence assessments

We operate in an industry where the assumed greatest risk is related to suppliers of goods or services that support our day-to-day office operations, such as the purchase of electronic products, etc. Our suppliers are all established in Norway, but some of them use subcontractors in countries outside Norway, including in low-cost countries where there may be a risk of violations of human rights and decent working conditions. However, preliminary reviews show that all suppliers are well aware of requirements for compliance with the Transparency Act, and have provided documentation enabling us to deem that all of them appear to be at low risk when it comes to possible violations of fundamental human rights or decent working conditions in their supply chain. We have not identified any negative conditions.

Although no actual or potential breaches were identified, it is important for us to be proactive.

Should future assessments reveal increased risk or indications of negative consequences, the Company will consider the following actions:


- Obtain additional documentation from the supplier, including third party audits or certifications (e.g. SA8000, ISO 26000).
- Ask the supplier to implement improvement measures within a given deadline, and follow up with a new assessment.
- Terminate cooperation with the supplier if the risk is considered unacceptable and cannot be mitigated.
- Consider alternative suppliers with a lower risk profile.


7 Request for information and dialogue with interesting parties

Throughout 2024, SVW has continuously performed and reported on our due diligence assessments, as well as provided information about our measures and findings, to certain external parties who have requested this. None of the inquiries have provided a basis for further follow-up.

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