



Due diligence on Human Rights

Nord Pool's supply chain – reporting in accordance with the Norwegian Transparency Act

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1. INTRODUCTION

The Norwegian Transparency Act (2021-06-18-99) shall promote enterprises' respect for fundamental human rights and decent working conditions and ensure that the public has access to information about how enterprises address adverse impacts on human rights and working conditions. The Transparency Act applies to (*inter alia*) larger enterprises which offer goods and services in Norway, and which are liable to tax to Norway. The Nord Pool group of companies consists of companies in Norway, Sweden and Finland, and a branch office in the United Kingdom, and the due diligence activities have been carried out, and this account of such activities has been prepared, based on the business activities, suppliers, and business partners of the whole company group. Any references to "Nord Pool" in this report shall therefore mean the Nord Pool group of companies as a whole.

2. NORD POOL COMPANY STRUCTURE AND BUSINESS ACTIVITY

The Nord Pool Group is constituted by the parent company Nord Pool Holding AS, its Norwegian subsidiaries Nord Pool AS and Nord Pool European Market Coupling Operator AS (Nord Pool EMCO), as well as of Nord Pool AS' Swedish subsidiary Nord Pool AB and Finnish subsidiary Nord Pool Finland Oy. Nord Pool Holding AS is a holding company with minimal business activity. Nord Pool Holding AS is consolidated into Euronext Group with Euronext N.V, Amsterdam, Netherlands as the parent company through Euronext Nordics Holding AS. A minority shareholding is owned by TSO Holding AS, a Norwegian company owned by Uab "Epsa G" 39,6%, Statnett SF, 32,2% and Svenska Kraftnät 28,2%.

Nord Pool is an organised marketplace and offers trading, clearing, settlement and associated services in the day-ahead and intraday power markets across 16 European countries. Nord Pool EMCO is a designated Nominated Electricity Market Operator (NEMO) pursuant to the CACM Regulation¹). Around 350 companies from 20 countries trade on Nord Pool's markets in the Nordic and Baltic regions, Great Britain, Central Europe (covering Austria, Belgium, France, Germany, Luxembourg, the Netherlands and Poland). Market participants are electricity generators, distributors, large consumption companies, aggregators, transmission system operators (TSOs), traders and trading representatives. Additionally, Nord Pool AS service the power markets in Croatia and Bulgaria.

Nord Pool offers a range of consulting services around market design, rulebook development and market regulation, power market systems and capacity building, and provides seminars based on knowledge of Nordic, Baltic and Europe-wide power market development.

Furthermore, Nord Pool offers compliance services, delivering efficient, simple and automated reporting tools to help market participants TSOs to meet obligations under REMIT and Transparency regulation.

The Swedish subsidiary Nord Pool AB operates as a contact point for Swedish and Danish customers. Nord Pool's employees in Stockholm are integrated in the organization and are part of the company structure - working for various departments such as with customers, regulatory affairs and market design.

¹ Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management

The Finnish subsidiary Nord Pool Finland Oy provides services to Nord Pool AS and Nord Pool EMCO in terms of IT development and maintenance. Nord Pool Finland Oy is also a contact point for our Finnish customers.

Nord Pool AS has its main office in Lilleaker in Oslo.

3. NORD POOL POLICY ON HUMAN RIGHTS

Nord Pool is concerned of the protection of the fundamental human rights and decent working conditions as follows from, among other, the United Nations' International Covenants on Economic, social and cultural rights of 1966, the International Covenant on Civil and Political Rights from 1966, and the ILO's Declaration on Fundamental Principles and Rights at work from 1998. Working to integrate respect for human rights in our everyday activities is an ongoing process, which includes due diligence, mitigating activities where needed, and stakeholder engagement.

Nord Pool has developed guidelines based on the Norwegian Transparency Act and OECD due diligence guidance for responsible business conduct. Guidelines include Nord Pool's entire business, our supply chain and our business partners.

Nord Pool regularly carries out due diligence in accordance with the OECD Guidelines for Multinational Enterprises in proportion to our size, the nature of our business and operations, and the severity and probability of adverse impacts on fundamental human rights and decent working conditions.

Nord Pool also recognises that training and awareness is an important means to ensure respect for human rights in our processes.

This annual report on Nord Pool's due diligence will be published on Nord Pool's website at the latest on 30 June for the previous year. Nord Pool will respond, as is our obligation under the Norwegian Transparency Act, to written requests asking for information from Nord Pool on how we address actual and potential adverse impact as identified in the due diligence analysis.

Written requests can be sent to a dedicated e-mail address and information about this as well as on Nord Pool's work with Human Rights shall be part of the ESG section on Nord Pool's website.

4. DUE DILIGENCE ANALYSIS

Given the nature and context of Nord Pool's business, the risk of Nord Pool contributing to violations of human rights is considered low. Nord Pool has carried out a due diligence analysis to map risks in the supply chain as well as doing an internal review of Nord Pool's treatment of its own employees. A summary of this analysis and review is provided below.

4.1 Working Conditions in Nord Pool Group

Nord Pool has approximately 145 employees spread across Norway, Finland, Sweden, UK, Germany, Belgium, Italy and the Baltics. Most of the workforce is located in Nord Pool's offices in Oslo and Espoo

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and a few employees are located to a small office in Stockholm. In London and Brussels the Nord Pool Office is co-located with the Euronext office. All office facilities are modern and of a high standard.

The work force consists of highly skilled personnel with their educational background in IT, economics, finance, law, engineering, administration and similar. All employees are engaged in office type work - no manual labour. Employees are given the flexibility to work up to two days per week from home, providing extended flexibility to combine family and work. Nord Pool employs people from 30 different countries spread across 4 continents. Corporate language is English, promoting a diverse group of individuals to work in an international work and business environment.

Nord Pool follows local national legislation regarding employment and working conditions. All countries where Nord Pool employees are employed have committed to the ILO convention.

Nord Pool has a dedicated HR department and internal HR procedures to secure proper employment procedures in accordance with national regulations, hereunder check of minimum age, adherence to rules related to working hours and holidays, leave entitlements, absence due to sickness etc. Nord Pool has a Personnel Plan Including a Diversity, Equity and Inclusion (DEI) plan, and a general Personnel Development plan.

A survey is conducted annually among employees to measure their well-being, engagement, and motivation. Results from the survey are used by the employer, *inter alia*, to assess the need for and to implement improvements in order to secure healthy and motivating working environment.

Nord Pool voluntarily follows relevant collective agreements in Sweden and Finland. In Norway, Nord Pool has entered into the B-contract with SAN concerning working hours, employment, and working conditions, including an insurance scheme.

Personnel with employment within operations, trading desk and IT, have some degree of irregular working hours, consisting of weekend duty and 24/7 on-call duty. Working hours and compensation for duty arrangements is regulated under a separate agreement between Nord Pool and the Employees.

4.2 Nord Pool's Supply Chain

Nord Pool's supplier list has been assessed collectively for the entire group. Each supplier or business partner in our supplier list delivers services or goods to at least one of the companies in the group. The starting point for the due diligence analysis were the suppliers and business partners through the year 2022. There were more than 350 suppliers and business partners – including those who have made one-off deliveries.

Some of the important suppliers are those delivering systems to the European market coupling projects that Nord Pool takes part in as a NEMO cooperating with other European NEMOs.

The assessments of suppliers and business partners will be performed continuously. It is a learning process and the internal guidelines are regarded as living documents subject to development and improvements.

The market participants who trade on Nord Pool's platforms have not been a part of the due diligence analysis conducted by Nord Pool since market participants have been regarded as Nord Pool's

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customers, paying for access to trade on Nord Pool's platforms. When selling electricity through Nord Pool's platforms the market participants could be considered suppliers to Nord Pool due to Nord Pool's position as central counterparty in trading. However, Nord Pool is of the view that it is a service provider to the market participants, both with regard to providing access to trade and the subsequent clearing and settlement. Nord Pool provides to the market participants access to a marketplace and, consequently, Nord Pool is a supplier to the market participants.

Type of suppliers:

The suppliers and business partners to Nord Pool are those providing services and goods needed in order to offer the services as described in section 2 above. Our list of suppliers is sorted into the following categories:

Type of supplier	Description
System Suppliers	System developers, suppliers of standard software solutions and business tools, hosting services and tele-communication.
Consultancies	Within auditing and within project or business management
Banking and insurance	
Law firms	Legal advise
Communication and Marketing	
Hotel/Conference	Meeting and conference facilities, hotel rooms, restaurants.
Office rentals	
Goods	Computers, phones, IT equipment, office supplies, furniture, profile articles, plants, etc.
Services	Cleaning and janitorial services, canteen, transport and courier services, security companies, occupational health service, and recruitment services.
Other	Research institutions, interest organisations, universities, governmental institutions, registries, and charities.

The key input factors in Nord Pool's business are IT technology and knowledge (own employees). The strategic suppliers to Nord Pool are system suppliers. Nord Pool has entered into long-term contracts with several large system suppliers.

No individual supplier within the categories goods and services is of significant relevance to Nord Pool's core business. However, due to the general nature of several of the businesses in this category, they have been regarded as relevant and have therefore been included in the due diligence analysis.

The Norwegian Labour Inspection Authority provides list of approved companies operating within cleaning, occupational health service and recruitment. All Nord Pool's suppliers within these categories are included in the list of approved companies.

Geography:

The geographical source of services and goods procured has been mapped.

The suppliers of Nord Pool have business addresses within the Nordic and other European countries, mainly Germany, UK, Austria, Belgium, France, and the Netherlands. Some suppliers are part of multinational, world-wide corporations.

5. FINDINGS

Nord Pool has not discovered any negative consequences or material risks through its due diligence assessments. Suppliers and business relations come from Nordic/European countries and are within business areas where breach of human rights is not common. Employees have bargaining power either through trade unions or because they themselves are highly educated with a possibility to choose between jobs.

6. MEASURES

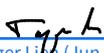
After the entry into force of the Norwegian Transparency Act, Nord Pool has implemented a human rights policy and internal guidelines for responsible business conduct. Nord Pool is also in the process of adopting the framework and policies regarding ESG which our parent company Euronext has implemented.

Creating awareness with regard to human rights is viewed as an important way to contribute to reducing the risk of violation of human rights anywhere. Internal training and implementation of policy and guidelines are valuable measures in this regard.

Nord Pool is also considering the need to implement a supplier code of conduct and making suppliers aware of Nord Pool's expectations regarding human rights.

Nord Pool's work with human rights and fulfilment of the obligations under the Norwegian Transparency Act is rooted in the company's management and Board of Directors. This report was presented and approved by the Board of Directors in the board meeting on 22nd June 2023.

Lysaker, June 22, 2023


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