

BAXT GRUPPEN AS – POLICY FOR SUSTAINABLE DEVELOPMENT

(adopted by the Board of Directors on 03.12.25)

This policy applies to the entire Baxt Gruppen AS (Baxt AS, Buer AS, Berthas Bakerier AS, Baxt Lierne AS), to all employees, hired-in personnel, board members, and companies we control, and forms the framework for our work with sustainable business practices and responsible corporate governance.

1. Introduction

Baxt Gruppen AS (Baxt AS, Buer AS, Berthas Bakerier AS, Baxt Lierne AS) works to maintain a sustainable business practice that respects people, society, and the environment. This policy document, including principles for sustainable business practices, forms the foundation for our sustainability work.

Baxt Gruppen considers sustainable business practices a prerequisite for sustainable development, which entails that today's generations meet their needs without compromising the ability of future generations to meet theirs. The UN Sustainable Development Goals are the world's common action plan for sustainable development. Baxt Gruppen actively works with the Sustainable Development Goals.

Sustainable business practices are an integrated part of Baxt Gruppen's business strategy and decision-making processes, and encompass environmental, social, and economic conditions in our own operations and throughout the value chain.

The policy is based on the OECD Guidelines for Multinational Enterprises and the OECD Due Diligence Guidance, as well as principles and expectations from Ethical Trade Norway and the Norwegian Transparency Act.

2. Roles, responsibilities, and anchoring

The Board of Directors of Baxt Gruppen AS has the overall responsibility for adopting and annually reviewing this policy, and for ensuring that sustainable business practices are integrated into corporate governance.

Group management is responsible for implementing the policy in strategies, objectives, routines, and processes, and for ensuring the necessary resources for implementation.

The professional manager responsible for sustainability/Ethical Trade Norway coordinates due diligence assessments, supports procurement and line managers with risk assessments and measures, and follows up on reporting and transparency.

Line managers are responsible for complying with the policy within their area of responsibility, including follow-up of suppliers, implementation of measures, and reporting of nonconformities and improvement proposals.

Employee representatives and the safety organization shall be involved in relevant parts of due diligence assessments and follow-up where this concerns working conditions and HSE.

3. Due diligence assessments

Baxt Gruppen conducts due diligence assessments as a continuous process in accordance with the OECD's six steps: embed responsible business conduct, identify and assess risk, cease/prevent/mitigate adverse impacts, track implementation and results, communicate openly, and enable remediation.

At least once a year, we shall update a consolidated risk assessment for human rights, working conditions, environment, climate, anti-corruption, and animal welfare in our own operations and in the supply chain, and use this to prioritize efforts and measures.

Baxt Gruppen shall have accessible channels for whistleblowing and complaints related to objectionable conditions, including matters related to people, working conditions, environment, and corruption, and these shall form part of the basis for our due diligence assessments and remediation work.

4. Requirements for our own operations

Baxt Gruppen acknowledges that our business practices may have potential negative impacts on people, society, and the environment. At the same time, we recognize our potential to contribute to positive development in the supply chain. Based on this, we have established the following principles and requirements for our own operations:

4.1 Responsible purchasing practices

We consider responsible purchasing practices to be one of our most important tools in the work toward sustainable business practices. We shall adapt our own purchasing practices so that we strengthen, and do not undermine, suppliers' ability to meet the requirements we set to ensure good conditions for people, society, and the environment. We shall strive for long-term supplier relationships with suppliers that demonstrate a particular willingness and ability to work toward positive development in the supply chain.

When planning prices, volumes, delivery deadlines, and changes to orders, we shall assess whether purchasing practices may affect the risk of violations of human rights, decent working conditions, and the environment, and adjust practices where necessary.

4.2 Freedom of association and worker representation

Baxt Gruppen supports the right to freedom of association and other forms of democratically elected worker representation. We shall involve worker representatives and other relevant stakeholders in our work with sustainable business practices.

4.3 Supplier development and partnerships

In dialogue with suppliers, we will, where necessary, consider contributing relevant capacity building or resources that enable our suppliers to comply with our requirements for conditions in the supply chain. In this way, we establish the foundation for good cooperation with suppliers that demonstrate a particular willingness and ability to work toward positive development for people, society, and the environment in the supply chain.

4.4 Anti-corruption

Baxt Gruppen, including all employees, shall never offer or receive illegal or improper monetary gifts or other benefits to obtain business or private advantages for themselves or advantages for customers, agents, or suppliers.

4.5 Countries under trade embargo

Baxt Gruppen, including our suppliers and business partners, shall avoid trading partners that have activities in countries subject to trade embargoes imposed by the UN and/or Norwegian authorities.

5. Requirements for conditions in the supply chain

We expect our suppliers and business partners to work purposefully and systematically to comply with our supplier guidelines, including principles for sustainable business practices, which cover basic requirements related to human rights, labor rights, anti-corruption, animal welfare, and the environment. Our suppliers shall comply with our ethical guidelines for suppliers, including principles for sustainable business practices. These guidelines are available on our websites.

We require that material suppliers carry out self-assessments and report on how they comply with our requirements related to human rights, working conditions, environment, climate, anti-corruption, and animal welfare.

By “material” suppliers, we mean suppliers that contribute a significant share of our purchasing volume, are critical to our value chain, or where the risk of negative impact on people, society, or the environment is assessed as elevated.

For high-risk suppliers, Baxt Gruppen may follow up with further dialogue, action plans, audits, or third-party verification to ensure improvement.

In cases of serious or repeated breaches of our requirements, and where dialogue and improvement measures do not lead to results within a reasonable time, Baxt Gruppen may terminate the cooperation with the supplier.

6. Environmental, climate, and social priorities

Baxt Gruppen will place particular emphasis on reducing negative environmental and climate impacts through measures related to food waste, energy use, transport, and packaging, as well as other relevant environmental aspects of our operations.

We prioritize decent working conditions, health and safety, equality, and diversity in our own operations and among suppliers, in line with international standards for labour and human rights.

7. Objectives, indicators, and reporting

To ensure implementation, Baxt Gruppen sets concrete objectives and process targets for sustainability work, for example related to the share of mapped high-risk suppliers, the share of purchasing volume covered by signed ethical guidelines, employee training, and relevant environmental and climate indicators.

We report annually on progress and results from sustainability work in line with the requirements and expectations of the Norwegian Transparency Act and, where relevant, EU regulations for sustainability reporting (CSRD/ESRS).

The policy is reviewed at least annually and updated as needed to reflect changes in legal requirements, stakeholder expectations, and Baxt Gruppen's own risk profile and experience.