

**TRANSPARENCY ACT REPORT
FOR
PROMENADEN PROPERTY AS
(ORG.NR: 911 965 658)**

AND SUBSIDIARIES (HEREINAFTER THE GROUP")

1. INTRODUCTION

This Transparency Act Report is prepared in accordance with the Norwegian Transparency Act and covers the parent company Mark Tomahawk AS ("Mark Tomahawk") and its subsidiaries mentioned in section 2.1 below (collectively referred to as the "Group"). The Group is committed to conduct its business with honesty and integrity and expects everyone who is involved in the Group's activities to maintain high standards for behavior in accordance with internationally proclaimed human rights and the Group's Supplier Code of Conduct. It is a high priority of the Group to ensure and promote fundamental human rights and decent working conditions in its operations and business relationships. Thus, the Group regularly carries out due diligence assessments in accordance with the OECD Guidelines for multinational enterprises.

2. COMPANY STRUCTURE

Mark Tomahawk is a holding company located in Oslo. Mark Tomahawk was established 1 June 2015 and is active within real estate through its subsidiaries.

Mark Tomahawk is the parent company of the following subsidiaries:

- Promenaden Property AS
 - Promenaden High Street AS
 - Geronimo Newco 2 AS
 - Prinsegaarden AS
 - Promenaden NSG 13 AS
 - ØS 10 Eiendom AS
 - HFS Øvre Slottsgate 18/20 AS
 - Kongensgate 31 AS
 - Nedre Slottsgt 23 Næring AS
 - Slottspassagen AS

PROMENADEN

MANAGEMENT

- ANS Eiendomspart Karl Johans gate 16 B
- High Street Shopping AS
 - Steen & Strøm Drift AS
 - Karl Johansgate 16 C AS
- Promenaden Egertorget AS
 - Egertorget Invest AS
 - Eger Magasin Råd AS
 - Promenaden Oslo AS
 - AS Kvadraturen Eiendom
 - Karl Johan Eiendom 23 B ANS
 - Karl Johan Eiendom 23 B AS

The Group's activities consist of development and enhancement of commercial and retail properties in Oslo. The Group owns the Strøm Department Store, Eger and 10 other properties in the city centre of Oslo.

3. THE GROUPS WORK WITH HUMAN RIGHTS AND DECENT WORKING CONDITIONS

3.1 Policies and Guidelines

In order to ensure fundamental human rights and decent working conditions in the Group's activities, the Group has in place a Supplier Code of Conduct and Standard Terms and Conditions which set out requirements for fundamental human rights and decent working conditions. Moreover, the Group has in place a Whistleblowing Policy.

Further, for construction suppliers the Group also have in place a Declaration of Seriousness ("seriøsitetserklæring") which the supplier must commit to before conducting any work on the Group's properties.

Additionally, all suppliers are asked to fill out a supplier declaration form enabling the Group to assess risks related to human rights and decent working conditions, and other compliance issues such as money laundering. The declaration form includes several questions relevant under the Transparency Act, e.g. what routines and policies the supplier has in place with regards to ensuring human rights and decent working conditions, and questions regarding raw materials and high-risk products, etc.

3.2 Compliance team

The Group does not have any employees, the Group's activities including the groups due diligence assessments are managed by the management company Promenaden Management AS. Promenaden Management AS has in place several guidelines and policies regarding ethics and responsible business conduct which also apply when acting on behalf of the companies in the Group.

PROMENADEN

MANAGEMENT

Promenaden Management AS has in place a Transparency Act routine to ensure the Group's compliance with the Transparency Act. Further, Promenaden Management AS has established a compliance team responsible for following up these the routines and assess the collected data.

The standard supplier documents as described above are collected and used as a basis for such assessed alongside other measures.

3.3 Supplier follow up, performance monitoring and procurement/purchasing strategy

In addition to establishing new routines, during 2023 Promenaden Management AS did a significant effort in going through their database of suppliers, issuing tenders, and creating new templates for supplier contracts which includes new environmental and social clauses.

For larger supplier contract Promenaden has included a system for performance monitoring and established a structure with quarterly meetings with the supplier going through the results of such monitoring (KPI's) to ensure that contractual obligations are followed up and to track any areas of improvements according to the Group's standards.

3.4 Staff and stakeholder training and awareness

During 2023 we have conducted staff training focusing on the new routines and procedures in place as well as creating awareness as to why it is necessary to follow up on these measures in their day-to-day work. Even though we have a compliance team in place, understanding and following up on the new implemented routines are all employee's responsibility.

All employees at Promenaden Management AS, and particular those who are entering into new agreements with suppliers, will conduct such training on regular basis. New employees, that have a role that requires this information will be introduced to and trained in the above procedures during their onboarding.

Moreover, Promenaden Management AS has organized training sessions for some of the Group's tenants. This training has included topics such as conflict handling, safety and working environment. We also plan to conduct a training of stakeholders within 2024.

4 THE GROUP'S DUE DILIGENCE ASSESSMENTS - METHOD

Human rights due diligence assessments of the Group are regularly carried out in accordance with the requirements set out in the Norwegian Transparency Act. The aim of the due diligence is to identify actual and potential adverse impacts on fundamental human rights and decent working conditions that a subsidiary of the Group has either caused or contributed towards, or are directly linked to the Group's operations, products or services through the supply chain or business partners.

In accordance with the OECD Due Diligence Guidance for Responsible Business Conduct, the due diligence assessments in the Group are carried out by using a two-step approach. The first step entails carrying out an initial, high-level assessment of the risks to which the Group is exposed. Based on this initial risk mapping, the Group identifies which parts of the Group's operations, suppliers and/or business partners are linked to the identified risks. In the second step, the Group prioritizes the most significant risks for a more detailed assessment and implements suitable measures to address the risks and adverse impacts.

5. RISK AND ADVERSE IMPACTS

5.1. Real estate development

For the business activities related to real estate development, the following risks are still considered relevant:

- HSEQ related risks: Safety hazards that lead to worker accidents and injuries.
- Working conditions of the contractor's workers.
- Employment contracts and extensive use of temporary workers. It is prohibited to hire labour to carry out construction work on construction sites in Oslo, Viken and former Vestfold County. All the properties owned by the Group is situated in Oslo city centre, we therefore find the risk connected to use of hired workers to be limited.
- Building materials used in the project, and whether the extraction/production has contributed to violation of basic human rights and decent work conditions.

5.2. Operation of real estate

For the business activities related to operation of real estate, the following risks are considered relevant:

- Working conditions of the suppliers' staff.

5.3. Marketing

For the business activities related to marketing, the following risks are considered relevant:

- Products and materials produced/bought and/or extracted from countries outside of Europe, and if the extraction/production has contributed to violation of basic human rights and decent work conditions.

5.4. Adverse impacts

The measures undertaken regarding the mapping and risk assessment of our supply chain have not revealed any adverse impacts on fundamental human rights and decent working conditions. However, we will continue to conduct mapping and risk assessments for upcoming periods. Additionally, we have implemented procedures and tools to ensure ongoing risk assessment of suppliers throughout the year. Furthermore, sources such as media coverage and input from relevant authorities and organizations, such as Amnesty International and the Labor Inspectorate, will be utilized to identify risk of violations. The Group will also monitor how other major real estate players comply with the legislation and strive to adhere to what is established as best practices in the industry.

6. MEASURES TO PREVENT ADVERSE IMPACTS AND MONITORING

6.1 Introduction

As Promenaden has not uncovered any actual adverse impacts on human rights and decent working conditions, no measures related to such have been necessary to implement. However, Promenaden has in

place several measures to mitigate risks and prevent adverse impacts. All measures are reported to Head of Legal.

6.2 Onboarding of new suppliers

The Group has adopted a routine for its due diligence assessments and onboarding of new suppliers:

1. Supplier contracts: Before entering into new agreements with suppliers, the relevant supplier must complete a supplier declaration form, cf. section 3.1 above. This is to enable the internal compliance team to conduct a thorough assessment of the new supplier and perform a risk assessment to evaluate potential risks associated with entering into an agreement with the potential supplier. Feedback based on the outcome of the risk assessment, the compliance team will provide a definitive decision, either approving or disapproving further engagement with the new supplier.

Both Supplier Code of Conduct and Standard Terms and Conditions must be signed before an agreement may be entered into. Supplier Code of Conducts and Standard Terms and Conditions are signed for all supplier agreements entered after 1 January 2024.

The larger supplier contracts are based on permanent staff significantly reducing the risk of temporary workers. The agreements also regulate the employee's right to training, insurances, written working agreements etc.

All our cleaning staff must wear ID and HSE cards while at work.

As described above, the performance monitoring system allows us to actively assess the requirements as stated in the agreements.

2. Construction contracts: The Group's Construction contracts includes clauses for safeguarding human rights and decent working conditions, as well as requirements for the contractor to carry out human rights due diligence and to report on any findings from the due diligence assessments. For all contracts entered into 1 January 2024 such clauses are included. Further all contractors have to sign a "Declaration of Seriousness", where the contractor e. g. declares that it shall respect and protect fundamental human rights and decent working conditions.

In 2023 we also included a green clause in all construction contracts focusing on building materials used in projects and circular economy.

3. Leasing agreements: The Group rents out space to several companies. Even though the tenants are not part of the Group's supply chain or considered to be business partners of the Group, the Group has implemented a new routine where requirements for ensuring human rights and decent working conditions have been included in all lease agreement entered into after 1 November 2022. Our tenants must also fill out and sign a declaration related to the assessment of anti-money laundering.

6.3 New procurement strategy and procedures

During 2024 the Group has faced a major internal reorganization and implemented a new procurement strategy as well as several new procedures, which involves a significant restructuring of our existing partnerships. Specifically, for the operations and project/development departments, collaborations have been terminated, and new ones have commenced. These changes have been carried out with the intention of reducing the number of suppliers and increasing the quality of each supplier within their field.

6.4 Accountability with the board

According to the Board's annual schedule, compliance is a topic reviewed annually in board meetings. Follow-up on the activity and reporting obligations stipulated by the Transparency Act is included as part of these meetings, including assessment of the supply chain, proposals for risk mitigation measures, and evaluation of actions. The Board will receive reports annually on the results of activities and risk assessments. The Chief Executive Officer delegates responsibility for the follow-up of tasks related to the Transparency Act to internal stakeholders within the organization.

6.5 Collaboration and Communication

An email address (aapenhetsloven@promenadenmanagement.no) is published on the company's website, and has been established as a channel for receiving inquiries related to the Transparency Act. Such inquiries will be forwarded to the Head of Legal who holds overall responsibility for overseeing procedures and guidelines and can gather necessary information from relevant departments to provide a response within the three-week deadline. Describe our collaboration with relevant stakeholders and governmental bodies in implementing the Transparency Act.

6.6 Continuous monitoring and improvement

Promenaden will proceed to continuously monitor the Group's operations, supply chain and business relationships, and shall communicate with relevant stakeholders to swiftly detect changes that could impact the risk assessments.

The risk level of suppliers and business partners, and whether risk of adverse impacts or actual adverse impacts have been uncovered, are taken into account when determining how often the supplier and business partner should be assessed. This is dependent on an individual assessment.

With regards to follow-up of suppliers, an internal form (traffic light system) has been established for ongoing assessments of suppliers. Through this process, we aim to uncover organizational changes and review their annual Transparency Act reports. Additionally, there will be continuous evaluation to determine if the Group deems it necessary to conduct further investigations with dedicated questions for suppliers.


To ensure that measures we implement are suitable to identify and mitigate risks, we continuously monitor our measures and routines and change or update them if necessary.

Generally, for all departments, throughout the year 2024, we will focus additional attention on suppliers we consider to be in risk zones within the following areas: HSE (Health, Safety, and Environment), working conditions of hired personnel and the use of temporary labor. This also includes products and materials purchased through suppliers and manufactured in countries outside of Europe.


PROMENADEN

MANAGEMENT

Signature

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