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Human Rights and Decent Working Conditions: Due Diligence Statement

Statement pursuant to the Norwegian Transparency Act for the financial year 2025

Foreword from the CEO

Mento supplies industrial products and technical solutions to the Norwegian and European energy sector. We have done so since 1971, and we know the industry well. At the same time, the current context for business is more demanding than it has been for a long time. War in Europe and the Middle East, geopolitical unrest, tariff uncertainty and inflation are reshaping global trade and making supply chains more uncertain. For a trading house with global supply chains, this is an operational reality we manage every day.

Activity levels among our customers are high, and the Norwegian continental shelf plays an important role in European energy supply. At the same time, the energy transition is real, and operating conditions will change. This requires us to understand and adapt to developments in our customers' needs and expectations.

Corporate customers increasingly require documentation of responsible sourcing and how risks of adverse impacts on human rights and decent working conditions are managed in the supply chain. This development is driven, among other things, by the Norwegian Transparency Act, the EU Corporate Sustainability Due Diligence Directive (CSDDD) and the forthcoming EU regulation prohibiting products made with forced labour. Mento is committed to following the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Responsible Business Conduct. These form the basis for our due diligence under the Norwegian Transparency Act.

In the first half of 2026, we carried out a structured screening of our key suppliers against known risks of adverse impacts on human rights and labour rights. We have also mapped raw materials in the products we distribute and identified material categories with systemic risk linked to geographical origin and production sectors.

This work is ongoing. We will never obtain a complete overview of the deeper tiers of the supply chains, and documenting the origin of materials and inputs far down the value chain is challenging. We therefore work systematically to improve our understanding of where risks are located and to follow up on prioritised areas. This is the work described in this statement.

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1. About the report

1.1. Legal basis and purpose

This statement has been prepared pursuant to Section 5, cf. Section 4, of the Norwegian Transparency Act, and describes the work of Mento Holding AS and Mento AS on due diligence related to fundamental human rights and decent working conditions. The statement is publicly available and is published on mento.no in accordance with the requirements of the Act.

The report forms part of the Mento Group's work on sustainability and management of ESG-related risk. The Group's due diligence is based on the international standard established through the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Responsible Business Conduct.

1.2. Reporting period and consolidation

The report covers the financial year from 1 January to 31 December 2025. Where relevant, information has been updated as of Q1-Q2 2026, particularly in relation to ongoing supplier dialogue and regulatory matters.

The report consolidates Mento Holding AS and all wholly owned subsidiaries. This includes Mento AS' trading and wholesale business and the production activities of Mento Service AS. Where relevant differences exist between business types, these are addressed separately in the report.

1.3. Scope of product range risk assessments carried out

The Norwegian Transparency Act requires due diligence to cover the company's entire product portfolio and business relationships. All products sold by Mento are, in principle, within the scope of this work.

Mento sells products within the following categories: Couplings & Fittings, Filtration, Flowline Equipment, Hoses, Mechanical Solutions, Oilfield Supply, Tube & Clamps, Valves and aquaculture products.

In Q1-Q2 2026, a structured risk assessment was carried out of the product categories that form the core of Mento's deliveries to the energy sector and represent the most material share of the company's revenue and supply chain exposure. The prioritisation of the screening scope was based in particular on transaction volume, material exposure and association with documented high-risk sectors.

1.4. About the due diligence and regulatory references

The due diligence covers two separate dimensions: own operations, including working conditions for Mento's own employees and hired labour, and the supply chain, including risks of human rights abuses and adverse impacts on decent working conditions at suppliers and in deeper tiers of the supply chain.

In addition to the requirements of the Norwegian Transparency Act, the assessments have been carried out in light of the EU Conflict Minerals Regulation (2017/821), which is a current obligation for certain mineral importers; the EU Forced Labour Regulation (2024/3015), which enters into force in December 2027; as well as the EU Corporate Sustainability Due Diligence Directive and the EU Corporate Sustainability Reporting Directive, which are relevant to several of our corporate customers.

2. About the group, business and supply chain

2.1. Group structure and business area

Mento Holding AS is a family-owned company headquartered in Tananger, Sola municipality, founded in 1971. The group consists of the parent company Mento Holding AS and the subsidiaries Mento AS, Mento Service AS and Wave Energy AS. The group's investments are based on three fundamental pillars: sustainability, active ownership and long-term value creation. The group is located in Tananger, Ågotnes, Kristiansund and Hammerfest.

The Mento group had an average of 183 employees in 2025. Sales revenue is geographically distributed with approximately 93 per cent from Norway and 7 per cent from abroad, as the Norwegian continental shelf constitutes the dominant customer segment.

The core business is carried out through Mento AS, which is a trading house and wholesaler with primary deliveries to the Norwegian and European energy sector. The business is organised into four business areas: Filtration, Hoses & Flowline, Valves and Supply.

The subsidiary Mento Service AS has production activities within mechanical solutions and offers rental, maintenance and recertification of supply equipment for the oil and gas industry.

The subsidiary Wave Energy focuses on research, development and promotion of wave power technology and the utilisation of ocean energy.

2.2. The supply chain

For the trading part of the business, Mento AS distributes products from a limited number of direct suppliers mainly based in Europe and North America. These are primarily large industrial groups headquartered in the United States, the United Kingdom, Canada, Italy, Germany and Spain, with their own production spread across several continents. Mento AS enters into long-term distribution agreements with these suppliers and does not have direct purchasing relationships with raw material producers or sub-suppliers in deeper tiers of the supply chain.

For the production activities in Bergen and Ågotnes, Mento Service AS purchases raw materials and input materials – such as carbon steel, stainless steel and duplex alloys, welding materials and tungsten carbide cutting inserts – from Norwegian and European suppliers.

The structural challenge in Mento's supply chain with regard to risks to human rights and decent working conditions is linked to deeper tiers. For the trading business, the operational risks are primarily located beyond the "first tier", meaning in the brand owners' own purchasing of raw materials and semi-finished goods. The primary material inputs for the products we distribute – including steel, copper, nickel, natural rubber, PVC resin, tungsten and tantalum – are sourced by these suppliers from global supply chains where there are risks of forced labour, conflict minerals and other adverse impacts on fundamental human rights and labour rights.

Overall, Mento's direct suppliers are well-managed companies with their own due diligence and statements on sustainability work, while the most material human rights risks are most often found in the deeper layers of the supply chain – in component production facilities in Asia and among smelters, mining companies and raw material producers with which Mento has no direct contractual relationships. This is a structural challenge common to actors in the industry and in many other industries. Understanding and addressing risks in these deeper tiers is at the core of Mento's due diligence work for the supply chain.

3. Policies and management systems

3.1. Overarching commitments: sustainability, responsibility and respect for people and the environment

The company is committed to ensuring that operations and business development are conducted responsibly. This applies to our own employees, customers and suppliers, as well as to the communities and environment in which the company operates.

Mento's overarching objectives for quality, health, safety and environment are set out in the company's HSEQ policy. Product quality must never be compromised for delivery time or financial considerations, and financial considerations must not take precedence over health, safety and environmental considerations. The company seeks to act with integrity and transparency towards customers, suppliers, employees and society at large, and continuously works to improve its own processes and deliveries.

On the environmental side, Mento has committed to working for sustainable consumption and production in line with UN Sustainable Development Goal 12, with emphasis on waste reduction, resource efficiency and environmental considerations in procurement, sales and transport.

Commitments towards people are embedded in a separate policy for human rights and decent working conditions. This policy is operationalised through our Code of Conduct, which clarifies our requirements and expectations regarding suppliers' respect for fundamental international human rights and labour rights.

The due diligence documented in this statement is a direct extension of these overarching commitments and describes how we work with them in practice.

3.2. Key governing documents

Mento's work on human rights and responsible business conduct in our value chain is operationalised through the company's Code of Conduct, which sets out specific requirements and expectations for suppliers in a number of areas.

Our Code of Conduct covers compliance with applicable legislation, business ethics, prohibition of improper payments and gifts, impartiality and conflicts of interest, health, safety and environment, and prevention of substance abuse. In the social area, suppliers are required not to use forced labour or child labour, to respect freedom of association and the right to collective bargaining, to comply with working time regulations and to ensure fair wages and working conditions for all employees – regardless of whether they are permanent employees, temporary employees or hired through staffing agencies. Our Code of Conduct also sets out explicit requirements for responsible sourcing of minerals: suppliers must have an appropriate policy and conduct due diligence for tantalum, tin, tungsten, gold and cobalt, including traceability in the supply chain. Suppliers must respect human rights in line with the Universal Declaration of Human Rights and respect the rights of Indigenous Peoples and minorities. Suppliers that use security contractors must specifically avoid human rights abuses. Suppliers must also comply with applicable environmental requirements and have systems in place for environmental risk management. By signing, suppliers commit to following up these requirements with their own sub-suppliers and business partners.

In addition to the supplier Code of Conduct, Mento's work on responsible sourcing is supported by the company's procurement policy and supplier requirement specifications, which set requirements for documentation, qualifications and technical standards in the supplier relationship. The group has procedures for supplier assessment and follow-up, which define criteria and processes for supplier evaluation, triggers for audits, management of non-conformities and follow-up of measures. Where a breach of the Code of Conduct is identified, the non-conformity must be registered, and the company must implement measures to cease actual adverse impacts or mitigate the risk of significant adverse impacts.

3.3. Organisational responsibility and resources

Overall responsibility for the due diligence work rests with the CEO of each subsidiary, with the Procurement Manager in Mento AS having operational responsibility for supplier follow-up and obtaining documentation. The due diligence work is integrated into the company's ordinary management reporting and is included as a topic in the annual internal audits carried out in the group.

Coordination between Mento Holding AS and the subsidiaries is ensured through common governing documents at group level, including the Code of Conduct and the procedure for supplier assessment, which apply to all subsidiaries. The reporting obligation under the Norwegian Transparency Act is managed jointly for the group.

In Q1-Q2 2026, supply chain risk assessments were supported by external expertise in responsible business conduct and human rights to ensure due diligence in accordance with UN and OECD guidelines. With the assistance of this external expertise, a structured screening of the supply chain was carried out against relevant risk contexts and relevant risks related to human rights and decent working conditions.

3.4. Supplier requirements and contractual framework

All suppliers in Mento's active supplier base are expected to sign the company's Code of Conduct. This entails a commitment to comply with the requirements and – upon request from Mento – to provide documentation supporting compliance, or to initiate a process for such documentation if full documentation cannot be provided immediately. Mento has included provisions in its supplier agreements regarding compliance with the Code of Conduct and the right to carry out audits and controls at suppliers.

As part of the follow-up of the risk identification carried out in Q1-Q2 2026, Mento AS will in 2026 prioritise supplier dialogue with particular emphasis on suppliers in the categories with the highest identified risk.

3.5. Grievance mechanism and whistleblowing

For our own employees, well-functioning channels for whistleblowing and complaints have been established through safety representatives, the working environment committee and the HR function. These channels are anchored in the Norwegian Working Environment Act and supported by the company's tripartite cooperation between management, employee representatives, the occupational health service and the safety service. All employees are aware of their right to report misconduct without risk of retaliation.

For affected stakeholders outside the company – including workers in the supply chain and others who may be affected by Mento's business activities – the information duty under Section 6 of the Norwegian Transparency Act is the primary available channel: anyone may submit a written request to Mento and expect a response within three weeks. Contact information is provided in Chapter 6 of this statement.

3.6. Relevant certifications

Mento AS is certified in accordance with NS-EN ISO 9001:2015 (quality management), NS-EN ISO 14001 (environmental management) and NS-ISO 45001:2018 (occupational health, safety and working environment). The certifications provide a framework for the company's management systems, including ongoing compliance assessments and internal audits, which also support the due diligence work.

4. Own operations – human rights and decent work for own workforce

This chapter covers working conditions for Mento's own employees and directly controlled working relationships. The content overlaps with information related to ESRS S1 in a CSRD context. Risks related to workers in the supply chain are addressed in Chapter 5.

4.1. Equality and non-discrimination

Mento works actively to promote equality and prevent discrimination in line with the purpose of the Norwegian Equality and Anti-Discrimination Act. This applies across recruitment, pay, promotion and protection against harassment. At the end of 2025, women accounted for 27.3 per cent of the group's employees. The Board consists of three persons, one of whom is a woman. The group aims to be a workplace with full equality between women and men, and the reporting duty under the activity and reporting obligations in accordance with the Equality and Anti-Discrimination Act has been published on mento.no.

4.2. Working conditions for own employees

At the end of 2025, Mento AS had 134 employees, with an average of 132 full-time equivalents during the financial year. The group as a whole had 183 employees at the end of 2025, with an average of 183 full-time equivalents.

The company is certified in accordance with NS-ISO 45001:2018 for occupational health, safety and working environment, and works continuously to maintain a working environment that protects employees from harmful physical or mental impacts. The certification entails ongoing compliance assessments and internal audits related to occupational health and safety management.

Short-term sickness absence in Mento AS was 2.5 per cent of total working time in 2025, down 0.03 percentage points from 2024, while Mento Service's short-term absence was 3 per cent of total working time in 2025, down 2.5 per cent from 2024.

The subsidiaries work actively on measures that can contribute to maintaining stable and low sickness absence. There were 0 accidents and 1 lost-time injury registered in 2025, where the employee returned to work within a short period of time.

Co-determination and employee representation are safeguarded through well-functioning tripartite cooperation between the company, employee representatives through the working environment committee, the occupational health service and the safety service. This cooperation is central to the annual internal audits. Mento seeks to establish and maintain trust-based dialogue with employees and their representatives, including trade unions, working environment committees and employee committees.

4.3. Use of hired labour and subcontractors

Mento AS uses hired labour from staffing agencies to a limited extent, primarily within production and logistics.

For hired workers performing work at Mento's facilities or on behalf of the company, the staffing agency is required to comply with Mento's Code of Conduct. Mento AS is aware that hired and temporary workers may have a weaker employment-law position than permanent employees, and that risks related to shorter notice periods, lower HSE training and lack of access to co-determination arrangements may arise. Such matters are also relevant in light of the Norwegian Transparency Act's requirement to assess own working conditions. Hired workers always work together with our own personnel and are treated on the same terms as apply to our own employees in the respective work operations.

4.4. Identified incidents and non-conformities – own operations

In 2025, no breaches of the requirements of the Norwegian Working Environment Act or the company's internal guidelines were identified. Nor were any confirmed breaches of the Code of Conduct or labour-law requirements related to own employees identified during 2025. We received no whistleblowing reports in 2025. At group level, there was one lost-time injury and no accidents in 2025. Any non-conformities registered through the internal audits related to the ISO certifications have been handled within the company's ordinary non-conformity system and have not revealed serious matters related to fundamental rights or decent working conditions.

4.5. Measures and results – own operations

Awareness of the Norwegian Transparency Act and the company's due diligence obligations has been addressed as part of ongoing business management. Relevant employees in procurement and management functions have been informed of the requirements arising from the Act and the international standards underpinning the due diligence work.

4.6. Forward-looking measures – own operations

In line with UN and OECD guidelines, Mento AS will review its own purchasing practices to ensure that price pressure and short delivery deadlines do not unintentionally place undue pressure on suppliers' and subcontractors' ability to provide decent work. This includes assessing whether contractual terms provide realistic scope for compliance with the requirements set out in the Code of Conduct.

5. Supply chain – risk areas, mapping and priorities

This chapter covers Mento's supply chain and business relationships. The content overlaps with information for ESRS S2 (workers in the value chain) and ESRS S3 (affected communities) in a CSRD context.

5.1. Mapping carried out

As part of strengthening due diligence on the supplier side, Mento AS carried out, in Q1-Q2 2026 and with the assistance of external expertise, a systematic review of 100 supplier relationships. The review focused on risks related to human rights, labour rights and exposure to forced labour and conflict minerals. The review was conducted based on the international standard for due diligence established by the UN and OECD, using a risk-based approach that emphasises directing efforts where the risk is greatest.

The purpose was twofold: to identify possible red flags related to relevant human rights and labour rights issues in the supply chain, and to map the extent to which Mento's suppliers themselves document that they manage relevant risk in their own operations and further down the value chain.

Each supplier relationship was assessed against a standardised template with more than 40 checkpoints. For 82 of the 100 supplier relationships, a comprehensive mapping and assessment was carried out. For the remaining relationships, a simplified review was carried out, as these suppliers either operate locally or otherwise within value chains where relevant risk is low. At the same time, all were screened for possible red flags. Based on the risk-based approach, Mento's remaining supplier base was not screened in this review, but all suppliers are subject to ordinary supplier assessment. If the company receives indications that other suppliers are involved in adverse impacts or serious risk, this will be followed up through established procedures.

References for the screening included, among other things, international sanctions lists, databases covering human rights in global value chains or in specific geographies, and the companies' own published documentation under relevant legislation such as the UK Modern Slavery Act, the Canada Modern Slavery Act and the German Supply Chain Due Diligence Act. As part of the review, not only specific suppliers were screened. A separate product-level screening was carried out to map known risks related to specific raw materials and input materials across product categories.

The specific checkpoints include whether the supplier has published a human rights policy, whether the supplier sets equivalent requirements for its own sub-suppliers, whether descriptions exist of due diligence carried out and supply chain mappings, and whether accessible whistleblowing and grievance mechanisms have been established.

The screening provides a snapshot as of Q1-Q2 2026. A new review is planned on a regular basis.

5.2. Findings

Overall risk distribution

Of the 100 screened supplier relationships, 11 were assessed as high risk (i.e. high risk exposure in the value chain and an immediate need for further documentation), 32 as medium risk (i.e. relevant risk exposure and/or a need for further documentation) and 57 as low risk. No confirmed information has been identified concerning specific breaches of human rights or labour rights in Mento's direct supplier relationships. One supplier relationship is subject to further follow-up after public information emerged concerning allegations of forced labour conditions for migrant workers in an Asian country involving a related party in the supply chain (sub-supplier tier). However, it is unclear whether the allegations concerning the conditions identified by international trade union organisations in 2024 are directly linked to products purchased by Mento.

Salient human rights-related issues

The most important single observation is that the most severe risks are largely not linked to Mento's direct suppliers – which are predominantly established companies in Norway, Europe and North America – but to the raw materials and input materials these suppliers themselves purchase, and which end up in the products distributed by Mento. It is in these deeper tiers of the value chain that forced labour, breaches of fundamental labour rights and other severe human rights risks are documented in international sources as occurring, without any specific links to Mento's own purchases having been identified.

No red flags have been identified with regard to the risk of adverse impacts on workers at Mento's direct suppliers. These matters are to a greater extent covered through the established procedures for assessing HSE and quality at suppliers, where suppliers must, among other things, document risk management systems for workplace health and safety.

The screening identifies four salient human rights-related risk areas:

- Forced labour in raw material production or components manufacturing is the most pervasive risk. State-imposed forced labour has been extensively documented by the UN and international human rights organisations in the production of certain raw materials and semi-finished goods that may be included in Mento's product range. The risk is not linked to the direct suppliers' own factories, but to input materials further upstream in the supply chain.
- Forced labour and forced labour indicators in raw material harvesting have been documented by the ILO and human rights organisations in certain geographical areas for nature-based raw materials that may be used in hoses and sealing products, including debt bondage, confiscation of passports and involuntary work among migrant workers in rubber-producing regions.
- Conflict minerals constitute a specific risk for products containing tungsten and tantalum, minerals used in valve components and certain specialised products. These minerals may originate from mining operations in conflict-affected regions, particularly in the Democratic Republic of the Congo and Myanmar, where armed groups have in documented cases controlled parts of extraction and where revenues from mineral trade contribute to financing ongoing conflicts and associated abuses against civilian populations. EU Regulation 2017/821 on conflict minerals requires importers of these minerals above defined thresholds to conduct due diligence based on OECD guidance to ensure that purchases do not contribute to such financing. Relevant minerals are included in certain product lines, but no specific direct links have been identified.
- Lack of transparency in the supply chain is a general risk factor. For some supplier relationships, obtaining an overview of where production takes place further upstream in the supply chain is generally challenging. Efforts to ensure traceability are an important part of responsible sourcing, but they are time-consuming and often a moving target – something that is not unique to our industry.

Concentration of risk in the value chain

Risk is concentrated along two dimensions: specific input materials and geographical areas of origin. The screening identifies nine material categories with systemic risk across supplier categories. This applies to certain types of synthetic polymers and nature-based raw materials linked to high-risk sectors and regions in East Asia and Southeast Asia, metals and alloys that may originate from Russian mining and smelters, minerals classified as conflict minerals under the EU Regulation originating from conflict-affected regions in Africa, and electronic components with possible exposure to production in regions of Asia where the risk of forced labour is high.

What these risks have in common is that they are primarily located beyond the first tier and in deeper tiers of the value chain, and that they cannot be identified by reviewing direct suppliers alone. They require systematic mapping of which materials the products actually contain and where those materials originate.

Suppliers’ own management of risk

The screening shows significant variation in how suppliers themselves document and manage risk. Some larger, listed groups have established frameworks for sustainability and responsible business conduct, published due diligence reports and active supplier codes of conduct with requirements that extend down the value chain. Others have published less documentation of systematic management of human rights risk. Intermediary structures where the manufacturer and country of production are not known to Mento are a particular challenge.

Possible blind spots

The screening has known limitations. These are not unique to Mento, but are relevant to all companies with comparable purchasing volumes and product categories with complex supply chains. Visibility into deeper tiers of the supply chain is limited. Where public documentation on raw material origin is unavailable, the assessment is based on known sector patterns. Recent changes in the sub-supplier structure of Mento’s own suppliers are not necessarily captured. Service providers and indirect purchases – including transport – have been screened at an overarching level, and risks related to hired foreign labour in these segments may be underestimated. Smaller and privately owned companies publish limited information about their own supply chains, which means that assessments for these companies are to a greater extent based on industry risk as a proxy. The screening provides a snapshot: new sanctions, ownership changes and production relocations may change the risk picture quickly.

5.3. Measures and expected results

For supplier relationships classified in the high-risk category, dialogue has been initiated concerning specific documentation needs, including confirmation of production origin, obtaining basic documentation of the supplier’s own due diligence, and clarifying possible links to allegations that have emerged in public sources.

Other supplier relationships will be followed up through a broader category-based track during 2026 and as part of continuous supplier follow-up. This includes obtaining origin documentation for the raw material categories most exposed to risk from the highest-volume suppliers, threshold checks for conflict minerals against the requirements of the EU Regulation for relevant product lines, and obtaining smelter certificates for metals where the origin of nickel and steel is uncertain.

Expectations regarding the results of this work must be realistic and forward-looking. Mento does not expect to obtain full documentation for all supplier relationships in the short term – this would neither be realistic nor consistent with how risk-based due diligence is intended to function.

What Mento expects to achieve is gradual and continuous improvement over time: better visibility of who actually manufactures the goods supplied and where, stronger integration of human rights and labour-related topics into ongoing supplier dialogue, a strengthened process for monitoring possible red flags in our suppliers' value chains, and a documented basis that can support our customers' own obligations under the EU Corporate Sustainability Due Diligence Directive and the EU Forced Labour Regulation when these regulatory requirements fully take effect in the coming years.

Supplier screening will be conducted regularly, and findings and classifications will be updated as new information emerges and supplier dialogues produce results.

6. Responsibility and contact

6.1. Responsibility and anchoring

The CEO of Mento is responsible for overseeing the implementation of the company's work on human rights and the Norwegian Transparency Act. Implementation is coordinated by the HSEQ function with the involvement of all relevant functions, including procurement, operations and finance. The Board approves the annual statement on due diligence, as required by the Norwegian Transparency Act.

6.2. Contact

We handle requests for information in accordance with the Norwegian Transparency Act.

Requests for information about Mento's work on fundamental human rights and decent working conditions should be directed to post@mento.no.

Approved by the CEO and the Board of Mento Holding AS, Mento AS, Mento service and Wave energy AS : 18 June 2026

Signed by

Bjørn Anders Dahle

CEO Mento Holding AS on behalf of the Board of Mento Holding, Mento AS and Mento Service AS