

# **Green Resources AS**

Transparency Act Report

2022-2023

# The Norwegian Transparency Act Report

Pursuant to Section 5 (§ 5) of the Norwegian Transparency Act (2021) we hereby present Green Resources' report that has been developed to comply with the legal requirements as stated in the Act.

The reporting requirements apply to Green Resources AS an enterprise resident in Norway which fulfils the requirements for "larger enterprises" as set out in § 3 of the Transparency Act and so it is directly subject to the obligations of the Norwegian Transparency Act.

The information in this report is valid for Green Resources AS and its consolidated subsidiaries in Sweden, Uganda, Mozambique and Tanzania. Green Resources Group does not cover entities that are not fully controlled by Green Resources AS, however if in future such entities would be part of the group then we would expect that their relevant policies to be aligned with those of Green Resources AS.

This report was approved by Green Resources AS' management and the Board of Directors on 19<sup>th</sup> December 2023 and covers the financial year ending 30<sup>th</sup> June 2023.



## 1. Organization and General Information

#### Overview

Green Resources AS is a sustainable vertically integrated forest company incorporated in Norway with Company Registration number 975 879 968. The company is East Africa's largest forest development and wood processing company. The company manages approximately 38,000 ha of plantation forest in Mozambique, Tanzania and Uganda.

It operates industrial facilities including two sawmills, three pole treatment plants and a veneer plant. Green Resources was established in 1995 and is a private Norwegian company owned by New Forests' Africa Forestry Impact Platform ('AFIP').

Green Resources produces a range of products ranging from primary forest products (standing trees, sawlogs and poles) to processed wood products (sawn timber, veneer and treated poles) as well as biomass. Green Resources' main customers are national utility companies, construction companies, independent wood processors and a variety of traders operating across the forest value chain.

More information about our business operations can be found in our corporate reports for FY22/23:

- Annual Report FY22/23 (password protected and provided on request)
- Sustainability Report FY22/23
- GRAS Corporate Profile 2024

#### Organization

Green Resources employs 533 employees in 5 countries. The head office is in Oslo, Norway. Green Resources AS shares are not publicly listed.

Green Resources' organization is divided into two distinct business segments: Forestry and Industrial Wood Processing.

#### Sustainability

Population growth, urbanisation, housing shortages and the transition to a lower carbon economy are drivers population growth and urbanisation are drivers for increased developments in timber construction, and a wider application of the commodity ultimately substituting high carbon footprint materials like concrete and steel.

Green Resources strives to be a responsible player in this field by supplying products and services that are grown and manufactured with the least possible impact on the environment, a negative carbon footprint and minimal disruption of social networks amongst surrounding communities whilst at all time creating value for our investors, employees and other stakeholders including local host governments.

Green Resources operations incorporate sustainable solutions and practices by adhering to international standards, trends, and best practices and aligning to United Nations Sustainable Development Goals. Many of its planted forests are certified by the Forest Stewardship Council (FSC), and corporate, social responsibility (CSR) programs are implemented throughout the business.

#### Global Presence

Green Resources is pursuing international growth in targeted markets, while safeguarding its existing market positions. The company is actively pursuing an export strategy and has selected products and markets for this purpose. Green Resources' products are sold regionally (Eastern and Southern Africa) as well as globally (mainly Asia and the Middle East). Green Resources' 533 employees work across 5 countries in 7 locations.



An overview of Green Resources' legal entities is listed in Appendix 1 at the end of this report. Further details about each of our locations and facilities can be found here: Operations – Green Resources

#### Our People

As of June 2023 Green Resources had 533 own employees in 7 locations in 5 countries. A significant portion of the organization's activities are performed by contractor employees and Green Resources offered employment opportunities to approximately 2,000 contractor employees (as of 30<sup>th</sup> June 2023).

Whilst Green Resources does not employ seasonal employees there is a degree of seasonality in our work especially on the side of contractors where there is a traditional peak around the planting season. More information on our key staff figures can be found in our Sustainability Report 2022 which can be found here: Sustainability Report – Green Resources

#### **Our Supply Chain**

With 2,945 active¹ suppliers in our global supply chain, ensuring a responsible approach and management of this network to mitigate negative impacts is a material topic for Green Resources GRAS is committed to maintaining a mutually beneficial relationship based on productivity and responsibility with our suppliers and customers. This means that we expect our partners to subscribe to the same standards and principles we subscribe to ourselves. This means that customers, contractors and suppliers, in particular those we have long term relationships with adhere to GRAS' safety, business ethics, and quality principles.

Suppliers are expected to adhere to our <u>Business Ethics and Principles Policy</u> and <u>Standard Terms and Conditions</u> are included in each contract with Suppliers which covers the Supplier Code of Conduct and Supplier Declaration, including our standards for health and safety, human and labour rights, environment, FSC commitment, business integrity and corporate social responsibility, as well as being competent and trustworthy.

Our expectations, commitments and actions are further outlined in our <u>Sustainability Report</u> where we report on Theme 5: Products & Supply Chain linked to our <u>Sustainability Agenda 2022-2032</u>.

In addition to the above, we provide training programs for all staff, suppliers and contractors on business integrity-related matters including:

- Business integrity risk assessment
- Anti-Money Laundering
- · Business integrity risk monitoring
- Whistle-blowing
- Anti-Bribery & Corruption
- Conflicts of Interests.

GRAS uses a contractor compliance process to conduct operational audits across the operation. The contractor audits are designed to rate contractors based on the following criteria:

- Operational standards & work planning
- Contractor employee ability
- Contractor management ability
- Safety, Health, Environment & Quality (SHEQ) factors
- Human rights requirements & legal compliance



<sup>&</sup>lt;sup>1</sup> Suppliers with transaction activity during period 1<sup>st</sup> July 2022 to 30<sup>th</sup> June 2023

## 2. Human Rights Management

Respecting human rights across operations and within the main supply chain and protecting people, safeguarding their welfare, and actively creating opportunities is both a moral imperative and operational necessity.

Green Resources recognizes that human capital is its most valuable commodity. Thus, it will train and promote local talent irrespective of gender, race, or cultural background and equally, ensure contractors, subcontractors and third-party labour takes place on similar terms as company employees. Green Resources will strive towards an injury-free workplace. Green Resources respects human rights, and it assesses its human rights impacts and mitigates any negative consequences.

We support and respect internationally proclaimed human and labour rights, as defined by the International Bill of Rights and the International Labor Organization (ILO) Fundamental Conventions as well as the UN Guiding Principles on Business and Human Rights (UNGP), Modern Slavery Legislation and OECD Guidelines for Multinational Enterprises.

To meet our commitments as to respect and support of human rights, Green Resources places our focus on the below areas:

- 1. Awareness training of human rights risks across our operations;
- 2. Promotion of gender inclusivity and balance in the workforce;
- 3. Work towards zero injuries in and related to our operations;
- 4. Promote local and national talent development;
- 5. Eliminate workplace harassment; and
- 6. Include contractors, supply chain and stakeholders in human rights goals.

Our expectations, commitments and actions are further outlined in our <u>Sustainability Report</u> where we report on Theme 6: Human Rights & Human Capital linked to our <u>Sustainability Agenda 2022-2032</u>.

#### 3. Governance

The multifaceted nature of our operations and its impacts (positive and negative) requires attention and coordination at the highest level of the organization. We have therefore established the Environment, Social, Safety and Impact ('ESSI') Panel which is a Board Committee and composed of Investor Representative (1), Board Representative (1) and Management Representatives (Group CEO and Group E&S Manager).

The ESSI Panel's role is to provide technical guidance on sustainability matters and ensures that GRAS complies with national and international best practices (such as FSC<sup>™</sup>, IFC PS and ILO) and meets investors' criteria in respect of its environmental and social obligations. GRAS benefits from its investors through their long-term experience investing in the forestry sector and the region, as well as through investors' sustainability teams that support the operations.

The work of the ESSI panel is guided by the Sustainability Agenda as well as a more detailed Environmental and Social Action Plan that is designed to align GRAS' operations to the <a href="IFC Performance Standards">IFC Performance Standards</a>.

Green Resources has a <u>Board Charter</u>, <u>Staff Handbook</u> as well as an elaborate Procedure on <u>Anti-Bribery and Anti-Corruption</u> and has various frameworks in place to manage compliance and business integrity risks. The Staff Handbook together with the Anti-Bribery and Anti-Corruption Guidelines describes our commitments and requirements regarding business practice, personal conduct and expectations towards business partners. The <u>Supplier Terms and Conditions</u> outlines clear principles and rules in key compliance and integrity areas, including how to deal with human rights and labour rights, health, safety and security, anti-harassment and diversity topics.



Green Resources maintains <u>Human Rights Management Guidelines</u> as well as a <u>Supplier Notice on Human Rights Policy</u> and both documents are firmly anchored in our organization. All documents mentioned can be found in our management system an some are available publicly on our website as well.

#### Policies & Procedures

Our governing documents are crucial for developing effective and consistent (human rights) standards across our business and for setting expectations for suppliers' and employees' decision-making on a day-to-day basis. A list of the governing documents we have in place to address (human rights) risks can be found below along with links where appropriate. All of our company policies are endorsed and signed off by relevant members of Green Resources' senior management. These governing documents are applicable to all of Green Resources' operations and are available on our Integrated Management System Platform.

- GRAS Business Ethics and Principles Policy
- GRAS Human Resources Management Policy
- GRAS Occupational Health and Safety Policy
- GRAS Security Policy
- GRAS Staff Handbook
- GRAS Risk Appetite Statement
- A-H-OD-02 GRAS Human Rights Management Guidelines
- A-H-OD-04 GRAS Supplier Notice Human Rights Policy
- G-31-04 GRAS Security Personnel Code of Conduct
- A-H-CM-06 GRAS Anti-Corruption and Anti-Bribery Management Guidelines
- G006-02 GRAS Risk and Opportunities Framework
- A-A-FA-034 Supplier/Vendor Approval Procedure
- A-A-FA-020 GRAS KYC Documentation
- GRAS Terms and Conditions for Suppliers
- Speak Out Platform

#### **Public Commitments**

In addition to the above, Green Resources' policies, and current practices are deeply rooted in a sustainable approach to business, and align to company commitments to comply to International Finance Corporation (IFC) Performance Standards and Forestry Stewardship Council (FSC) Principles & Criteria. These policies and commitments form the foundation of the Sustainability Agenda which sets out long term aspirational goals that drive the development of targeted Environmental, Social and Governance (ESG) action plans, as well as serving as a guide to support the Business Development Strategy

Green Resources respects the Freedom of Association (FoA) as a fundamental right of its workers to join and form trade unions or organizations of their choosing. FoA is enshrined in the Universal Declaration of Human Rights. It includes the right to freedom of assembly, association, and trade union membership. The company's commitment to this is covered through various Central Bargaining Agreements with Unions present at our operations.

In Tanzania employees are unionized through the Tanzanian Plantation and Agricultural Workers Union (TPAWU) and Tanzania Union of Industrial and Commercial (TUICO) Workers. In Mozambique, employees have been unionised under SINTAICAF and SINTIQUIAF. In Uganda workers are not unionized but management has regular meetings with employees and the worker rights are covered through the Staff Handbook and various policies and procedures laid out in the Integrated Management System.

The principles of all these agreements, initiatives and memberships underpin Green Resources' respect and support for international standards. We have made human rights a part of our supplier qualification requirements and we use our influence with suppliers and encourage them to work in compliance with our



Code of Conduct to ensure that they are also committed to avoid harm to people in their own business and supply chains.

## 4. Activities to identify negative impacts on Human Rights

Green Resources often engages in work under challenging conditions, requiring the highest level of



diligence to maintain the human and labour rights and the safety of employees and customers, subcontractors, consultants and other parties. Moreover, we have own operations as well as supply chain in countries associated with high political, corruption and human rights risks. Because of the nature of our work and the locations where we operate, human and labour rights are material topics for Green Resources.

The Human Rights Index offers a coverage of 187 countries and territories. Country results are presented on a 0-100 scale, where 0

corresponds to the lowest risk and 100 corresponds to the highest risk. The three countries where Green Resources has active operations are ranked 149 (Mozambique), 158 (Tanzania) and 165 (Uganda)

#### Risk Assessment

Green Resources has identified that potential significant risk exposure to human rights violations may be detected in its local supply chain in particular in relation to contractor operations. The most important prescriptions in the International Bill of Human Rights related to supply chain management are:

- Right not to be subjected to slavery, servitude, forced labour, or child labour
- Right to enjoy just and favourable conditions of work, and
- Right to health

In order to identify, prevent, mitigate and account for how Green Resources addresses its adverse human rights impacts, the company will carry out human rights due diligence. The process will include assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed

#### Integrity Due Diligence

Green Resources performs ongoing Due Diligence on our customers, suppliers and other business partners such as NGOs and charities we work with. This Due Diligence is guided through the use of <a href="https://example.com/EthiXbase360"><u>EthiXbase360</u></a> where screening is done related to:

- Corruption
- Human rights violations
- Violations of international sanctions
- Other economic crimes (e.g., money laundering, terror financing)
- Environmental breaches
- Other material risks

A key component of the Due Diligence process is the KYC documentation that is to be completed for each Business Partner (Customer, Supplier, etc...) where trade is exceeding certain thresholds or is deemed particularly sensitive from a community perspective or is perceived to high risk in terms of corruption exposure.



Based on an internal risk assessment Green Resources applies extra diligence in assessing and screening business partners in our operational countries (Tanzania, Mozambique and Uganda) and in particular in below areas of our operation:

- Import & Export Activities (i.e. Port related activities)
- Renewal of Operating Licenses and Permits
- Consultants supporting Government Interaction (i.e. Tax Assessment, Renewal of Permits and Licenses)
- Community Activities including Donations and Partnerships with NGOs
- Donations
- Land acquisition or divestment activities
- Forestry Contractors

The risks are clearly communicated internally through training documents to ensure all members of staff are intimately aware of areas of high risk

Training Registers are maintained in order to assess if adequate training has been provided throughout the organization and various job categories.

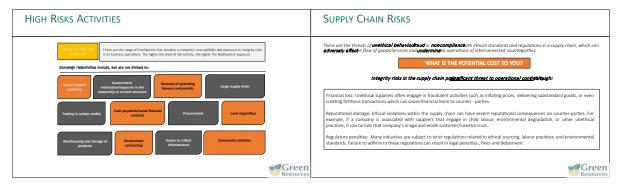


Exhibit: Extract from Green Resources Training Documentation on Business Integrity

During FY22/23 Green Resources did not identify severe negative human rights impacts in our operations however we came across two incidents of migrant labour working in operations where the legality of the workers could not immediately be established.

In the next chapter we describe our activities to mitigate or remediate the potential or actual adverse impacts.

#### Activities to prevent and mitigate negative human rights impacts

Due diligences and audits within our supply chain contribute to the overall supply chain continuous improvement. We believe that a collaborative approach with the value chain contributed towards raised awareness on working conditions and to positively aligning our partners on our commitment to human rights.

An overview of our approach and key mitigating measures embedded in our processes:

#### Cascading Requirements in the Supply Chain

We strive to ensure that our suppliers, vendors, and subcontractors share our commitment to safety, business integrity, respect for human rights and compliance. We also expect that they in turn also apply the same principles towards their own employees, suppliers, subcontractors, and agents with whom they work in the delivery of goods and services to Green Resources. We therefore cascade our expectations and requirements for human rights protections to our suppliers and subcontractors.



These requirements are included in our Supplier Declaration which was implemented in 2023 as a integral part of our supplier contract documentation.

#### Contractual Clauses

Contractual clauses are a tool to signal expectations of respect for internationally recognized human rights to our business associates. Contractual clauses can allow us to demand a contractual party address and eventually rectify human rights violations or terminate a contract if deemed necessary. We include 'audit rights' clauses in our contracts with suppliers to have the possibility to verify their compliance with the Supplier Declaration commitments.

#### Inspections, Reviews and Audits

We perform regular inspections for our own locations, projects and business partners. Controls of human rights guidelines and directives are regularly carried out, often in conjunction with a broader review of health and safety, procurement procedures and/or quality.

Annual external FSC audits frequently focus on Supply Chain compliance to Human and Labour Rights. Green Resources undergoes 5 FSC Audits per annum (3x FSC Forest Management and 2x FSC Chain of Custody)

#### Reporting of concerns, whistleblowing, and grievance mechanisms

Feedback (both positive and negative) from our stakeholders is important for Green Resources. We believe feedback helps us to improve our relationships with stakeholders and improve the company's operating activities.

We are committed to building a culture of trust where employees are comfortable to ask questions, seek guidance, raise concerns and report suspected violations. Green Resources' whistleblowing channel allows anyone (including externals) to anonymously report concerns, incidents, breaches or suspected breaches of the Code of Conduct, other internal policies, or laws and regulations.

For comments, suggestions or questions please email us at <a href="mailto:info@greenresources.no">info@greenresources.no</a>

For grievances, please email us at <a href="mailto:speakout@greenresources.no">speakout@greenresources.no</a>

#### Investigations

All notifications to the whistleblowing channel are received and managed by our Group Environmental and Social Manager and are treated with strict confidentiality. The Group E&S Manager has a mandate to investigate alleged compliance violations and can report these direct to the Shareholders, Board or ESSI Panel Members if the nature of the grievance should require so. Investigations are carried out in accordance with the rules set out in the Grievance Management Process (G030-0001 Grievance Management Process).

Incidents and investigations that uncover malpractices or breaches of causing, contributing to or being complicit in human rights violations shall result in recommended remediation and improvement actions. In such cases, remediation and improvement actions will be directed at the negatively impacted people and will seek immediate rectification by the offending party or where such breach is intolerable will result in termination of the business partnership.

#### Collaboration with External Service Providers

In collaboration with an external service provider Green Resources has undertaken a review of a historic (2021) case of harassment at one of our operating companies to assess the need to strengthen controls and make additional resources available to deal with future cases.

The outcome of the investigation/review resulted in a list of actions that are in process of being implemented.



To read more about our approach to stakeholder engagement, please go to our Sustainability Report FY22/23 (p41) and also review Theme 4: Land, Communities & Stakeholders from our Sustainability Agenda 2022-2032.

#### Internal and External Training, Toolbox Talks and Awareness Sessions

Throughout the FY22/23 we continued training and awareness campaigns across the organization. We hold regular toolbox talks on topics such as human rights abuses, bullying, and sexual harassment. This communication is accompanied by top management commitment and the Group CEO regularly holding talks to drive the culture change that is required in today's work environment.

The annual publication of the Sustainability Report is another way in which Green Resources strives to make its audience and stakeholders aware of the importance of human rights in its supply chain.

During FY22/23 employees across the organization received training on our Business Integrity program; this can be found on page 55 of our Sustainability Report FY22/23. During the year 262 people received training on Business Integrity, meaning that we reached approximately 50% of our staff through formal training sessions.

#### Compensation and Remediation

Addressing adverse human rights impacts requires taking adequate measures for their prevention, mitigation and, where appropriate, remediation.

We investigate incidents and, where people are affected, we offer counselling and provide active support to compensate or remediate the situation often with the help of specialized partners or service providers.

We are continuously focused on further development of our human rights program including audits and supply chain risk assessments. Looking forward, tracking of metrics related to human rights impacts and supplier dhuman ocumentation will play an increasing important role to improve our performance in this area and to avoid harm to people.

Oslo, 19th December 2023

Mar 20, 2024 19:46 GMT+1) Paul Speed

Chairman

Terhi Koipiiärvi (Mar 18, 2

Terhi Koipijärvi Director

Lilian Kitosy **Group CFO**  Cornelis I.C. Lemm.

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Demetrius Kweka Group ESG Manager



## Appendix I

This report applies to the following legal entities

- Green Resources AS (Norway)
- Nortan AS (Norway)
- Global Solidarity Forestry Fund AB (Sweden)
- Busoga Forestry Company ltd. (Uganda)
- Green Resources AS (Tanzania Branch Office)
- Sao Hill Industries Ltd. (Tanzania)
- GRL Tanzania Ltd (Tanzania)
- Green Resources Niassa S.A. (Mozambique)
- Niassa GreenPly Lda (Mozambique)
- LFL Lindi Forest Limited (Tanzania)
- TFL Tanga Forest Limited (Tanzania)
- LGR Lurio Green Resources (Mozambique)
- NFZ Ntacua Floresta de Zambezia (Mozambique)
- TFZ Tectona Forest of Zambezia (Mozambique)
- CFM Compania Florestal de Massangulo (Mozambique)



# GRAS Norwegian Transparancy Act Report FY2022-23

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