

Policy for Boycotting Goods and Services from Countries in War and Conflict

1. Purpose and Background

The core of our responsibility work lies in the goods we produce and sell, with a focus on sustainable value chains that can withstand future demands. Our value chain is global, complex, and exposed to climate change, with challenges related to human rights, working conditions, and the environment. We work systematically to address these challenges and require the same from our suppliers.

Risk assessments form the basis of our work on due diligence and responsible trade. We assess raw materials and production countries based on parameters such as human rights, working conditions, and environmental impact. These risk assessments provide an overview of the greatest risks and help prioritize risk-reducing measures.

REMA 1000 Norge AS (hereafter referred to as REMA 1000) is subject to the Transparency Act and therefore also obligated under the UNGP and OECD Guidelines for Responsible Business Conduct to comply with conventions applicable in conflict areas and to carry out due diligence adapted to the specific risks present in these regions.

Due diligence must identify and address all negative impacts on the conventions covered by OECD and UNGP. Companies are required to map all negative consequences their operations have on human rights, based not only on what is produced in the value chain but also on whether parts of the production chain take place in conflict areas involving violations of international law.

The purpose of this policy is to clarify REMA 1000's position and procedures related to the purchase and distribution of goods and services from countries in war and/or conflict and occupation, particularly in cases where key stakeholder groups request that we boycott specific countries.

2. Scope of the Policy

This policy applies to all units, employees, and operations within REMA 1000, including but not limited to the purchasing, sales, marketing, and distribution of products and services. The requirements in this policy may be adjusted based on our due diligence assessments.

REMA 1000 may have business relationships with suppliers operating in conflict or occupied areas. This can link us to human rights violations or breaches of international law, either directly through goods and services developed in these areas or indirectly through suppliers' activities. In situations involving occupied territories, it may be desirable to engage with parties that are under or affected by

occupation. However, thorough assessments of the relevant parties must be carried out.

3. Roles and Responsibilities

This document applies to all employees of REMA 1000 and covers the supply chain for our private label products (EMV). The owner of the policy is responsible for publication and distribution. Managers must ensure that employees are familiar with the content and comply with the principles and requirements of the policy. All responsible parties and managers must report any deviations.

4. Our Policy on Boycotting Goods and Services from Countries in War and Conflict

At REMA 1000, we comply with applicable laws and regulations in Norway and the EU regarding trade in goods and services from all countries. Our policy is to follow the sanction lists issued by national authorities at all times. This means that any boycott of goods or services from a country will only be implemented if it is decided by national or international bodies through official resolutions.

4.1 Due Diligence

REMA 1000 seeks to avoid trading with suppliers that violate international law and human rights. Therefore, we will:

- Conduct enhanced due diligence in conflict areas in line with UN and OECD guidelines.
- Refrain from purchasing goods and services from illegally occupied land or businesses that violate international law and human rights.

To assess risks in conflict areas, REMA 1000 will consider the following questions:

- Do we sell or purchase goods or services to/from countries that are occupying power?
- Do we purchase from occupied territories, and is the business affiliated with the occupying power?
- Do we have business relationships in these countries?
- What do we know about the conflict and the parties involved?
- Who are the different parties to the conflict?
- Are there allegations of war crimes or human rights violations?

5. Attachments

None.

6. Change Log

The owner of the policy is responsible for ensuring that the policy is regularly evaluated and updated as necessary.

Version	Updates/changes
Version 2025:1	