



KINLAND AS
ACCOUNT OF DUE DILIGENCE IN ACCORDANCE WITH THE NORWEGIAN TRANSPARENCY ACT
(KADD-002)
FOR THE REPORTING PERIOD 1 JULY 2023 – 30 JUNE 2024

1. INTRODUCTION

1.1 Kinland AS ("*Kinland*", together with its subsidiaries and parent holding company Odin BidCo AS the "*Group*") is a leading provider of social infrastructure assets in the Nordics and selected European jurisdictions. The Group focuses on providing high-quality properties used primarily for nationally important educational and care services. Such properties are a cornerstone of the welfare systems in the countries in which we operate, promoting work participation, gender equality, and successful integration.

Our mission is to provide a safe and quality environment needed for the care of the people that use our properties. We do so guided by our motto: "We invest where people live".

1.2 Our duty as an employer is to provide a safe and comfortable work environment with an emphasis on health and safety measures, labour standards and working conditions. Our overarching policy is to operate our business in a manner designed to protect the health and safety of our employees, customers, the public and the environment, and in accordance with applicable laws and regulations so as to ensure the protection of the environment, our personnel and property. This is reflected in the Group's internal policies such as our group-wide Code of Conduct and HR policies applicable for certain employer entities within the Group. Violations of such policies will constitute grounds for disciplinary actions.

1.3 In order to achieve our business objectives whilst committing ourselves to the responsibility entrusted to us by all stakeholders, e.g. customers, shareholders, regulators and society, the Group places great emphasis on cooperating with business partners that promote high standards of good business practice, fundamental human rights and decent working conditions. Fundamental human rights means the internationally recognised human rights that are enshrined, among other places, in the International Covenant on Economic, Social and Cultural Rights ([link](#)), the International Covenant on Civil and Political Rights ([link](#)) and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work ([link](#)). Decent working conditions means work that safeguards fundamental human rights, health, safety and the workplace environment, and that provides a living wage.

We require, and have a duty to ensure, that the Group's supply chain and contractors abide by the minimum standards set by the jurisdictions in which they operate. This includes measures to prevent child labour and other forms of forced labour or modern slavery.

1.4 This account of due diligence (the "*Account*") has been adopted by the Board of Directors of Kinland (the "*Board*") in accordance with the Norwegian act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (the "*Transparency Act*") ([link](#)).



2. DUTY TO CONDUCT AND PUBLISH DUE DILIGENCE ASSESSMENTS

2.1 As a large enterprise headquartered in Norway, offering goods or services in Norway and abroad, the Transparency Act requires Kinland to:

- (i) conduct due diligence assessments to determine wherein our own business and our supply chain our most prominent risks lie in terms of ensuring fundamental human rights and decent working conditions; and
- (ii) publish an account of these due diligence assessments.

Due diligence shall be carried out regularly and in proportion to Kinland's size, the nature and context of our operations and the severity and probability of adverse impacts on fundamental human rights and decent working conditions.

2.2 Assessments shall be carried out in accordance with the OECD Guidelines for Multinational Enterprises (the "*OECD Guidelines*") ([link](#)), which states that enterprises shall, within the framework of internationally recognised human rights, the international human rights obligations of the countries in which they operate as well as relevant domestic laws and regulations:

- (i) respect human rights, which means they should avoid infringing on the human rights of others and should address adverse human rights impacts with which they are involved;
- (ii) within the context of their own activities, avoid causing or contributing to adverse human rights impacts and address such impacts when they occur;
- (iii) seek ways to prevent or mitigate adverse human rights impacts that are directly linked to their business operations, products or services by a business relationship, even if they do not contribute to those impacts;
- (iv) have a policy commitment to respect human rights;
- (v) carry out human rights due diligence as appropriate to their size, the nature and context of operations and the severity of the risks of adverse human rights impacts; and
- (vi) provide for or co-operate through legitimate processes in the remediation of adverse human rights impacts where they identify that they have caused or contributed to these impacts.

2.3 Adherence to the Account applies to all entities controlled by the Group and all employees, directors, officers and agents of the Group whether or not employed directly or hired in (collectively, "*Employees*"). All Employees are required to read and understand this Account and are encouraged to ask questions regarding its application. Employees may direct such questions to their immediate supervisor (in the absence of an actual or potential conflict of interest), a member of the executive management of Kinland or to a member of the Board.

2.4 Employees individually are ultimately responsible for their compliance with the Account. Every manager will also be responsible for administering the Account as it applies to Employees and operations within their area of supervision. Violation of the Account will constitute grounds for disciplinary actions.



- 2.5** Employees who observe or become aware of a situation that they believe to be a violation of the Account or to introduce heightened risks of non-compliance with fundamental human rights, health and safety standards or decent working conditions, whether caused by an Employee or an external business partner, have an obligation to notify their immediate supervisor, the executive management or a member of the Board unless the Account directs otherwise. Violations involving a manager should be reported directly to a member of the Board. When a manager receives a report of a violation, it will be the manager's responsibility to handle the matter in consultation with a member of the Board.

If an Employee reporting a violation wishes to remain anonymous, all reasonable steps will be taken to keep their identity confidential. All communications will be taken seriously and, if warranted, any reports of violations will be investigated. Kinland will not retaliate, or allow retaliation in respect of any reports made by an Employee in good faith.

3. IDENTIFICATION OF ACTUAL AND POTENTIAL ADVERSE IMPACTS ON FUNDAMENTAL HUMAN RIGHTS AND DECENT WORKING CONDITIONS

3.1 Structure and area of operations

Kinland, through its subsidiaries, invests in and manages social infrastructure assets in the Nordics and selected European jurisdictions. Our assets are purpose-built for educational and care services. They are let to private and public operators on long-term lease agreements, the majority of which are triple-net. A triple-net lease agreement entails that the tenant is responsible for property maintenance and upkeep and that asset-related expenses such as property tax, property insurance and land lease payments are borne by the tenant. Assets leased out on non-triple-net agreements will typically imply that the landlord will bear the costs associated with either property taxes, property insurances and/or land lease payments.

3.2 Employees

All personnel directly employed by entities within the Group are subject to annual performance reviews with their immediate supervisor, a member of the executive management or Board of Kinland, including sections for self-assessment vis-à-vis pre-agreed KPIs, corporate and personal development goals and feedback on Kinland's business, the employee's supervisor, and executive management. Kinland's obligation to provide a safe and comfortable work environment with an emphasis on health and safety measures, labour standards and working conditions is one assessment component in this regard.

3.3 Customers

Operations carried out at our premises serve a social and nationally important purpose. Our tenants are Nordic-headquartered private enterprises and public municipalities providing early education and specialised care services. Our tenants need licences to practice regulated educational and healthcare professions and are subject to strict regulations and reporting obligations imposed and monitored by local authorities. Regulations include, but are not limited to, the Kindergarten Act and the Framework Plan for the Content and Tasks of Kindergartens in Norway, the Act on Qualification Requirements for Social Welfare Professionals and the Act on Health Care Professionals



in Finland and the Act concerning Support and Service for Persons with Certain Functional Impairments (LSS) in Sweden. Licences to operate and the adhering regulations include requirements for e.g. qualified staff, working hours and minimum pay.

Owing to the above, Kinland view the risks of tenants' non-adherence to fundamental human rights and decent working conditions as low. Nevertheless, Kinland will dedicate increased attention to tenants with regulated operations in situations where such tenants constitute a concentration risk within the Group's tenant mix. Moreover, any tenant of the Group which is not subject to operating licences, governmental regulations or reporting obligations relevant for their operations at the Group's assets will warrant increased attention from Kinland to prevent actual or potential adverse impacts on human rights and working conditions.

3.4 Suppliers

As an owner of social infrastructure assets leased out on primarily triple-net agreements, the Group's spectrum of service providers is limited compared to that of other property owners. Our suppliers comprise providers of the following services:

- (i) accounting and auditing of the Group's sub-groups and asset-owning entities;
- (ii) tax and legal advisory;
- (iii) acquisition due diligence and transaction advisory;
- (iv) employment-related health care and insurances;
- (v) market intelligence databases and industry news;
- (vi) office hotel solutions and employee canteen;
- (vii) charitable donations recipients; and (infrequently)
- (viii) construction companies or specialist craftsmen when conducting owner's cost investments such as major renovations or end-of-lease upgrades on our assets.

Kinland view the risks of non-adherence to fundamental human rights and decent working conditions as lower amongst our chosen providers of professional consultancy services listed as (i) to (iii) and amongst service providers listed as (iv) and (v) above. As to providers of services listed as (vi) to (viii) above, Kinland acknowledges that providers of office hotel solutions depend on a number of sub-suppliers for facility services such as cleaning and maintenance, that charitable projects and foundations engage with third parties to deploy donations received from Kinland and others, and that canteen services and the building construction and renovation industries are by some viewed as carrying heightened risks of human rights, health and safety and working conditions non-compliance. Consequently, Kinland allocates increased attention to such service providers and non-profit foundations as an integral part of our efforts to identify and mitigate adverse impacts on human rights and working conditions.



4. MEASURES TO CEASE, PREVENT OR MITIGATE ADVERSE IMPACTS ON FUNDAMENTAL HUMAN RIGHTS AND DECENT WORKING CONDITIONS

4.1 Selection criteria for stakeholder engagement

4.1.1. For the purpose of adhering to the requirement for our business partners to promote high standards of good business practice, fundamental human rights and decent working conditions, Kinland will routinely engage with suppliers to which annual payments represent >5% of the Group's consolidated operating expenses in any fiscal year. Suppliers of goods and services rendered to our tenants and their operations on our premises, the operating expenses from which are normally invoiced to our property-owning entities and subsequently re-invoiced tenants in accordance with their lease agreement with a member of the Group, will in general not form part of the aforementioned stakeholder engagement.

4.1.2 Stakeholders such as, but not limited to, those noted in sections 3.3 and 3.4, deemed to carry an implied heightened risk of human rights and working conditions non-compliance, will due to e.g. the nature of their service offerings or the industries wherein they operate warrant the Group's increased attention and engagement regardless of having exceeded the threshold set forth in section 4.1.1.

4.2 Engagement procedures

- *Step 1:* Stakeholders qualifying for human rights, health and safety or working conditions compliance engagement will be asked to document compliance with the OECD Guidelines, outline relevant internal guidelines implemented and measures taken to cease, prevent or mitigate adverse impacts. An account of due diligence prepared by the stakeholder in accordance with the OECD Guidelines is one such qualifying document.
- *Step 2:* Should a stakeholder be unable to deliver satisfactory or unambiguous evidence of compliance, or measures to address adverse impacts of non-compliance, with fundamental human rights, health and safety or decent working conditions guidelines, Kinland expect the stakeholder to take prompt action to implement sufficient measures and demonstrate compliance.
- *Step 3:* If warranted, Kinland will on a case-by-case basis engage third-party advisers to evidence a stakeholder's compliance.
- *Step 4:* In cases where Kinland is unable to obtain sufficient comfort of stakeholder compliance following any of the aforementioned steps, Kinland reserves our right to terminate parts of or all engagements with the stakeholder and to duly report our suspicions of human rights, health and safety or working conditions non-compliance to relevant authorities. Actual adverse impacts identified through the Group's due diligence efforts will be made public through updates to our account of due diligence and/or notifications on our website ([link](#)). The legal basis for such actions is our obligation under the Transparency Act, as well as to safeguard our legitimate interests and establish, enforce or defend legal claims.



4.3 Implementation and monitoring of measures

The Group's compliance with the Transparency Act, including the implantation and monitoring of measures implemented to cease, prevent or mitigate adverse impacts on fundamental human rights and decent working conditions forms part of Kinland's routine Board reporting.

4.4 Findings during the relevant reporting period

In accordance with the selection criteria and engagement procedures outlined in sections 4.1 and 4.2, Kinland has during the reporting period engaged with four key suppliers and has reviewed the account of due diligence prepared by six key suppliers as well as two of the Group's largest tenants.

Based on the above as well as Kinland's assessments of compliance with the OECD Guidelines within our own organisation, the Group has not identified actual or material risks of non-compliance with fundamental human rights and decent working conditions guidelines.

Questions related to Kinland's adherence to and continuous work with the Transparency Act may be directed to info@kinlandgroup.com.

5. DATA PROTECTION

In order to ensure compliance with the Group's duty of disclosure pursuant to the Transparency Act, we will process personal data relating to those requesting information. The personal data processed will primarily be contact information as well as other information necessary to carry out the Group's processing of the information disclosure. The legal basis is our obligation under the Transparency Act, as well as to safeguard our legitimate interests and establish, enforce or defend legal claims.

Oslo, 30 June 2024

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Kinland AS Account of Due Diligence	
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