

A photograph of a rural landscape. In the foreground, a red fire truck is partially visible on the right side, with its rear light bar and bumper in focus. The truck is parked on a dark, wet asphalt road. In the background, there is a green field, several bare trees, and a small red building. The sky is overcast and grey.

SOS Veihjelp and Åbenhetsloven

Due Diligence Statement
2023/24

Approved by the board of SOS Veihjelp 17. juni 2024

DUE DILIGENCE STATEMENT

In an ever more complex economy that is open and integrated with other countries, Norway has made the work of ensuring human rights and decent working conditions a high priority. Accordingly, “Åpenhetsloven” has been passed. The aim is to promote enterprises’ respect for human rights and decent working conditions, and to ensure the general public information regarding how enterprises address potential and actual adverse impacts on human rights and decent working conditions.

“Åpenhetsloven” obligates enterprises in scope to carry out due diligence. This year’s due diligence process has brought about many valuable insights for SOS Veihjelp, one being how important collaboration and good relationships within the industry is. Something we benefitted greatly from in terms of exceptional support from our network of towing stations.

For you to understand how we work with human rights and decent working conditions, this statement will provide you with information about SOS Veihjelp’s:

1. Services and company structure,
2. policies, guidelines, and alert channels,
3. how the due diligence was conducted, and
4. which adverse impacts and risks were identified, implementation plans, and the expected results of the implementation plans.

We thank each contributor to this year’s due diligence and are happy to share the results with you in this statement.

Please enjoy your reading.

1 SERVICES AND COMPANY STRUCTURE

SOS Veihjelp is a significant actor within the Norwegian market for roadside assistance. From our 24-hour alarm centre in Oslo we provide technical support, towing, and other related services to insurance companies, car manufacturers, and NAF members. We deliver our services in Norway, and, when breakdowns occur during car holidays, in the rest of Europe.

To provide our services in Norway, we operate our own towing station in Oslo and rely on a domestic network of external towing station suppliers. In the rest of Europe, the supplier network is shared with the SOS International’s Nordic Mobility Division.

SOS International A/S is the parent company of SOS Veihjelp with a 67% ownership share, whilst the remaining 33% is owned by NAF. SOS International operates within three key business areas (Travelcare, Mobility, and Healthcare) across the Nordic countries: Norway, Finland, Sweden, and Denmark.

2 POLICIES, GUIDELINES, AND ALERT CHANNELS

SOS Veihjelp is governed by SOS International’s policies. The two main policies within this area are the Company Code of Conduct and the Supplier Code of Conduct. The latter obligates SOS Veihjelp’s suppliers to adhere to the same obligations as those laid out in the Company Code of Conduct.

The Company Code of Conduct commits SOS International to respect human rights and labour rights as recognised by the applicable laws, conventions, and international standards and principles. Further, employees and suppliers shall abstain from any involvement in breaching said rights and, if relevant, promote human rights when working in countries where respecting human rights is not self-evident.

Additionally, SOS Veihjelp has the following agreements, guidelines, and alert channels:

- HMS guidelines and procedures.
- Collective bargaining agreements.
- »Vernerunder« concerning health, environment, and safety.
- Anonymous employee engagement surveys about engagement and well-being.
- Procedures for reporting concerns and violations, e.g., a whistle-blower scheme.
- Adult vocational training (AMU) meetings which include representatives from management, trade unions, the occupational health service (bedriftshelsetjenesten), and the chief protection officer (hovedverneombud).

Want to know more? Find information on our website: <https://www.sos.eu/en/who-weare/compliance/>

3 SOS VEIHJELP'S DUE DILIGENCE PROCESS

The focal point for our due diligence was the OECD Due Diligence Guidance for Responsible Business Conduct. Below you will find an overall description of SOS Veihjelp's approach to the five due diligence steps herein.

Step 1: Imbedding responsible business conduct into policies and management systems.

The first step aims to devise and imbed responsible business conduct policies into management systems and in connection to suppliers and other business partners. Thus, SOS Veihjelp reviewed the Codes of Conduct, guidelines, procedures, and alert channels described above. We found that they are compliant with "Åpenhetsloven", and they have therefore not been subject to any changes.

Step 2: Identifying and assessing adverse impacts in operations, supply chains, and business partners

The second step seeks to examine the company's risk of having negative impacts on human rights and decent working conditions directly, or indirectly through suppliers and business partners. The assessment for SOS Veihjelp consisted of three main activities:

- Mapping of our own operation, business partners, and suppliers,
- Desk research regarding general and industry risks
- Self-assessment survey.

Mapping of our own operation, business partners, and suppliers

SOS Veihjelp mapped its own operations and compiled an overview of business partners and suppliers, which we divided into three main categories: Towing station network; Administrative and technical; and Business Partners. The towing station network represents the majority of SOS Veihjelp's domestic suppliers and is the only category in which SOS Veihjelp is the sole purchaser.

Desk research regarding industry risks

After we completed the mapping, we started researching the Norwegian labour market, and it became evident that the transport sector is particular in risk of being subject to work-related crime. Thus, we prioritized a more in-depth assessment of the Towing station network as: Towing stations share some of the same characteristics as the transport sector; their physical working environment is stressful; they represent the majority of our suppliers; and the close collaboration already in place is a good starting point for more human rights and workers' rights initiatives. We did this by sending them a self-assessment survey.

Self-assessment survey

The survey consisted of 20 questions within the theme's human rights; workers' rights; environment and climate; documentation; and market. The towing station engagement was impressive in terms of response rate, and overall, the score was high on all themes. The lowest scores could be observed within the themes of environment and climate, market, and documentation.

Step 3: Cease, prevent, or mitigate adverse impacts

This third step involves stopping activities that are causing or contributing to adverse impacts. In order to make sure we do this effectively going forward, we explored the possibilities of integrating the rights of Åpenhetsloven into the educational programmes, audits, and industry conferences already in place.

Step 4: Track implementation and results

This next step includes tracking the effectiveness of the due diligence activities. This we will do continuously in relation to the annual wheel of our audit programmes and industry conferences (fylkemøter). For further improvement of our setup, an evaluation of our performance will take place in connection with the next due diligence.

Step 5: Communicate how impacts are addressed

The final fifth step is to externally communicate the results of the due diligence. Accordingly, SOS Veihjelp is publishing this report and engaging with the Towing station network.

4 ADVERSE IMPACTS AND RISKS IDENTIFIED, IMPLEMENTATION PLANS, AND EXPECTED RESULTS

SOS Veihjelp did not discover any actual negative impacts during this year's due diligence, and as described above, the self-assessment survey came out very positive. Even so, we consider documentation a potential adverse impact, because the survey did not require documentation of the answers given, and because the lowest score could be observed within the theme of documentation.

We will therefore focus on obtaining such documentation; consequently, SOS Veihjelp will make human rights and decent working conditions a high priority during the future annual towing station audits, and we will make the obligations and rights of Åpenhetsloven a part of the agenda of our annual fylkemøter.

The audits and fylkemøter are expected to help us obtain a deeper understanding of the current situation within the towing station network at a level that self-assessment surveys cannot provide. We believe this will give us a greater grasp of industry impacts and risks, thereby informing and enhancing our future due diligence work. Lastly, it will increase awareness and hopefully inaugurate even more industry dialogue and cooperation.

5 EMBEDDING HUMAN RIGHTS AND LABOUR RIGHTS

In continuation of the Due Diligence process, we have focused on strengthening and anchoring human rights and labour rights within our roadside assistance network. Due to very large differences in the composition and size of the network, we have initially focused on the twenty largest stations. Together with our own Oslo station, we now cover 67% of the total volume in Norway. The process has had four steps:

1. Formulation of guidelines
2. Local management support
3. Competence assurance

4. Audit Process

In collaboration with the network, we have uncovered existing local guidelines and formulated new standard guidelines. They have been screened against our existing Code of Conduct and Supplier Code of Conduct and found that they comply with SOS International's guidelines. The material has been sent to our network.

In general, we have experienced great support for the work. The managerial support has been obtained in the form of a signed declaration from all districts, acknowledging that both the company and its employees have obligations that must be followed.

The material is formulated so that it can be included in the stations' competence programmes for existing and future employees. Also, with written approval. There is an ongoing dialogue whether the guidelines should be published on other platforms to meet local needs.

6 FROM PRINCIPLES TO PRACTICAL BEHAVIOR

SOS Veihjelp recognizes that the specification of guidelines cannot stand alone. Fylkemøter can be used as a body to discuss the general principles and express support for the ongoing work. Fylkemøter can also be used to inform about progress in our work with human and labour rights. However, it will continue to be the audit programmes that will be the backbone of future compliance efforts. The audit is carried out at different intervals, with the largest stations being audited at least once a year. In this context, the audit programmes have been reviewed and revised. The revisions now include:

- Employment contracts
- Review of the competence matrix, including signing our human and labour rights guidelines
- Review of mandatory courses; among other safety on the road
- Physical and mental working environment

Revision of employment contracts has been carried out by the stations submitting the standard contracts used for employees. These have been reviewed to ensure that they are in line with workers' rights. The audit will confirm, through random checks, that these contracts are used in practice.

Training and competences are already enrolled in the audit process as we believe that high level of competences and knowledge is a crucial contribution to our wellbeing. The audit process will continue to focus on competency level, including ensuring that human and labour rights guidelines are signed.

The audit will also ensure that employees have mandatory courses in a safe working environment, as roadside assistance continues to entail a certain risk for employees.

Finally, the audit includes a review of the physical as well as the psychological working environment. This is done by an inspection of the station and a rating based on objective criteria. The first revisions were carried out in the spring. The statement of assurance shows that the districts are in control of guidelines as well as documentation. We have not disclosed any breaches.

Further work on documentation will continue during 2024.

7 CONTACT INFORMATION

Want to know more about our work? Please contact SOS Veihjelp at: groupsustainability@sos.eu