

Transparency Act Due Diligence Statement 2022

ML 33 Invest AS



**ARCTIC**

## **Introduction**

This statement has been published in accordance with the requirements of the Norwegian Transparency Act. The document covers the full operations of the ML 33 Invest AS, including the subsidiaries ML 33 Holding AS and Martin Linges Vei 33 AS (“Group”).

Furthermore, it sets out the steps taken by the board of directors of ML 33 Invest AS to continue the work to assess, prevent, and mitigate the risks of modern slavery and human trafficking in its business operations and supply chains, during the fiscal year from 1st January 2022, ending 31st December 2022.

## **Value proposition**

### **Who we are and who we want to be as a responsible company**

ML 33 Invest AS take the responsibility of having a positive impact on the people and communities involved very seriously. The company is committed to protecting the human rights of people who work throughout our value chain. We have policies and processes in place to achieve this ambition.

## **Who we are**

### **What do we do?**

ML 33 Invest AS is classified as an alternative investment fund in accordance with the provisions of the Act on the Management of Alternative Investment Funds (referred to as the "AIF Act").

The group operates in the commercial real estate market and the business is to own, manage and lease real estate. The Group's revenue is related to rental income from the Group's investment property at Fornebu. The Group's headquarters is in Oslo.

## How we are set up (governance)

ML 33 Invest AS has 1.823 shares, divided into 1.000 ordinary shares and 823 preference shares. There are no ultimate beneficial owner and the largest shareholder holds 250 shares as at 31.12.2022. 940 shares are owned by shareholders with less than 1 % ownership in the company.

The board of Directors consist of six board members. The group does not have a CEO or any employees. Arctic Real Estate Management AS is the Business Manager of the group and oversees the daily operations, providing regular reports to the group's board. Arctic Alternative Investments Management AS serves as the fund manager of ML 33 Invest AS.

The Board of Directors is responsible for the Group's compliance in accordance with the Transparency Act, as well as overseeing strategic direction, decision-making, risk management, compliance, stakeholder representation, policy-setting, and corporate governance. The board has established corporate governance guidelines on how to handle certain matters.

## Our policies and procedures

### Supplier Code of Conduct

Starting in 2023, the Group has implemented a new Suppliers Code of Conduct for all new suppliers. The implementation of the new Code of Conduct will enable us to request information more easily from our suppliers for verification purposes or conduct reviews of the supplier's conditions as part of our routine control measures aligned with the Transparency Act. All direct suppliers, licensing partners, and relevant indirect suppliers must contractually agree for their own operations as well as their sub-suppliers' operations to be evaluated on their performance.

In accordance with the Transparency Act, the Group will conduct regular evaluations of third-party entities, with a particular focus on safeguarding fundamental human rights and promoting fair working conditions. These evaluations will be carried out prior to new assignments with suppliers, and in response to any reports or suspicions of violations related to fundamental human rights and working conditions.

## **Our due diligence of the supply chain**

### **Who are our third parties?**

The primary purpose of the group is to own and lease the commercial office building located at Martin Linges Vei 33. To ensure effective operations and optimal property management, we collaborate with a diverse range of suppliers and business partners. These include facility management companies, property maintenance providers, construction firms, architects, engineering consultants, legal and financial advisors, as well as technology providers.

We have identified the following risk areas under the Transparency Act: building and construction workers, plumbers, electricians, craftsmen, caretakers, gardeners, cleaning workers, and canteen services. In our review of all the group's suppliers and partners, we have assessed the extent to which the group could cause, contribute to, or influence violations of labour rights or human rights.

In our assessment of all the group's suppliers and business partners, we have found that we are either directly connected, or that we make up for an insignificant share of the supplier's turnover in most cases. In such cases, have not implemented any specific measures beyond the measures described in the rest of the report.

The due diligence has mainly focused on suppliers where the group might contribute to or influence potential violations, while at the same having sufficient influence on impact decisions counteracting such violations. Regarding suppliers subject to reporting under the Transparency Act, we await their release of the due diligence report for 2022. We will review the reports and consider further actions in connection with the risk assessment for 2023.

### **No instances of negative impact**

We have not discovered any deviations in our review. If negative consequences were discovered we would manage, resolve, and engage in dialogue with the supplier. We would through appropriate actions ensure that the breaches do not repeat and establish better procedures to prevent potential similar breach or negative consequences.

## Grievance mechanisms/Whistle-blower channel

The group, having no employees, is not currently obligated to have a reporting channel. However, the group is actively exploring options to establish a reporting channel. The contact information to the group's business manager is available through their website.

## Our responsible path into the future

### The way forward

Starting in 2023, the Group has implemented a new Suppliers Code of Conduct. furthermore, when onboarding new suppliers, we will ensure that all adequate information is disclosed.

The group will ensure annual reporting on the Transparency Act.

\*\*\*\*

Oslo, 30<sup>th</sup> June 2023

---

Anthony Donghun Kang  
Director of the board

DocuSigned by:  
*Erik O. Jacobsen*  
1399ABB826ED46E

---

Erik O. Jacobsen  
Board member

---

Gaeun Kim  
Board member

DocuSigned by:  
*Kenneth Frode Gooværts Bern*  
1BACCB038C0E4EE...

---

Kenneth Frode Gooværts Bern  
Board member

DocuSigned by:  
*Anders Christopher Wilhelmsen*  
5DCFEA252519480

---

Anders C. G. Wilhelmsen  
Board member

DocuSigned by:  
*Ragnar Sjoner*  
972413AA7C15438...

---

Ragnar Sjoner  
Board member

