



Norwegian Transparency Act
Boss Coliving Holding AS

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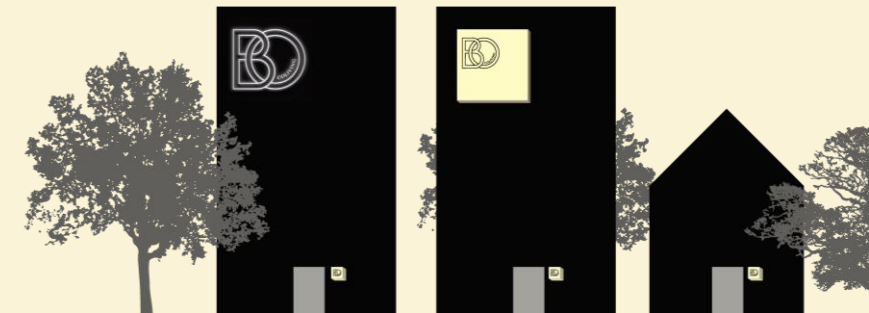
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On behalf of the management team at Boss Coliving Holding and its subsidiaries, I am glad you have chosen to familiarize yourself with the work we have done to abide by the Norwegian Transparency Act. Please take the time to read through the document, and feel free to bring forward any questions you may have.

Quality and transparency is important to us, and it is our obligation to promote enterprises' respect for fundamental human rights and decent working conditions, and to ensure the public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions*.

We will continue to set requirements for our collaboration and business partners and expect them to respect basic requirements for the environment, social conditions, good working conditions, as well as ethical business operations with a focus on combating money laundering, financial crime and corruption.



Hans Stenseng
Hans Stenseng
COO

[*https://lovdata.no/dokument/NLE/lov/2021-06-18-99/%C2%A71#%C2%A71](https://lovdata.no/dokument/NLE/lov/2021-06-18-99/%C2%A71#%C2%A71)



INTRO



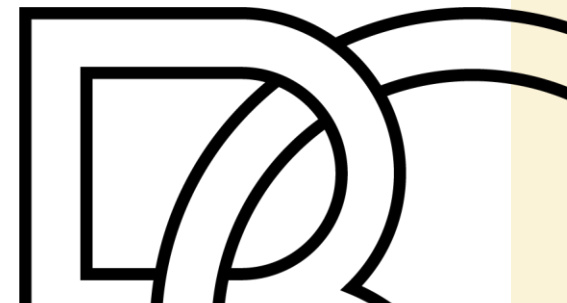
❑ Introduction to the Norwegian Transparency Act

The Act shall promote enterprises' respect for basic human rights and decent working conditions in connection with the production of goods and the provision of services, and ensure the public has access to information about how businesses deal with negative consequences for basic human rights and decent working conditions.

By fundamental human rights it is meant the internationally recognized human rights that are enshrined, among other places, in the International Covenant on Economic, Social and Cultural Rights of 1966, the International Covenant on Civil and Political Rights of 1966 and the ILO's core conventions on fundamental principles and rights at work. Decent working conditions means work that safeguards basic human rights and health, environment and safety in the workplace, and that provides a living wage.

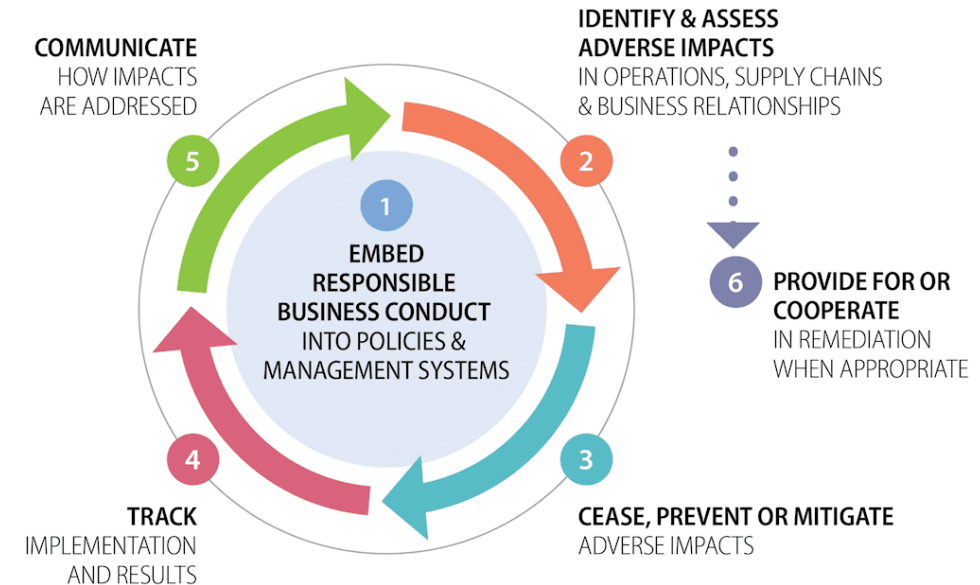
By supply chain it is meant any party in the chain of suppliers and sub-contractors that supplies or produces goods, services or other input factors included in an enterprise's delivery of services or production of goods from the raw material stage to a finished product. By business partner it is meant any party that supplies goods or services directly to the enterprise, but that is not part of the supply chain.

The enterprises must carry out Due Diligence assessments in line with the OECD's guidelines for multinational companies. The Due Diligence assessments must be carried out regularly and be in relation to the size of the business, the nature of the business, the context within which the business takes place, and the severity of and the likelihood of negative consequences for basic human rights and decent working conditions. The businesses must publish an account of the Due Diligence assessments. The statement must be made easily available on the company's website or be easily accessible. In the annual report, the companies must state where the report is available. The report must be updated and published by 30 June each year and otherwise in the event of significant changes in the business's risk assessments. It must be signed in accordance with the rules in Section 3-5 of the Accounting Act.



Methodology for the Transparency Act work

The methodology used to answer the requirements in the Transparency Act follows the OECD's guidelines for due diligence for multinational enterprises in accordance with § 4 in the Norwegian Transparency Act. The method is based on a model that contains the following components and activities:



<https://transparencygate.com/help/transparency-act-in-norway/>

The data used is the enterprise' supplier register, supplier transactions as well as global risk indicators for violations of human rights, violations of decent working conditions, violations of economic and tax legislation and the maturity of national environmental policy. The analysis further looks at current guidelines, routines and procedures the company has in place to be able to map, carry out, measure, evaluate and follow up potential negative impacts for the company, suppliers and business relationships.



ABOUT



■ Boss Coliving Holding AS

Boss Coliving Holding AS is a leading developer and operator of residential properties optimized for co-living under the Bo Coliving brand. Our properties are centrally located and provide residents with access to extra amenities and services. Through extensive use of new technology, we simplify and ensure quality in processes and communication.

Our ambition is to become the preferred nationwide provider of co-living spaces for students and young professionals. We are responsive to residents' needs and facilitate self-management through our app, which digitizes the entire rental process for increased security and efficiency. With our portfolio of high-quality properties in central locations, we create an optimal living and customer experience.

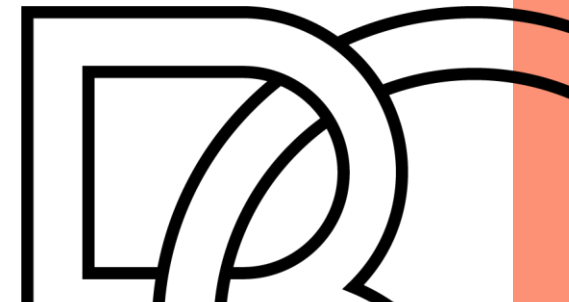
Boss Coliving Holding AS is dedicated to minimizing its environmental impact through sourcing sustainable, & energy-efficient technologies.. By integrating eco-conscious principles into our operations, we aim to not only reduce our carbon footprint but also inspire residents to adopt more sustainable lifestyles. As we continue to expand our footprint and enrich our communities, Boss Coliving Holding AS remains committed to innovation, and social responsibility.

In 2023, the US property investment and management company Heitman acquired the majority of the shares in Bo Coliving. At the time of the acquisition, Johan Rasting was slated to remain CEO alongside the existing management team. However, he stepped down from his position in February 2025 and his signature is therefore replaced by the COO in his role as interim general manager.



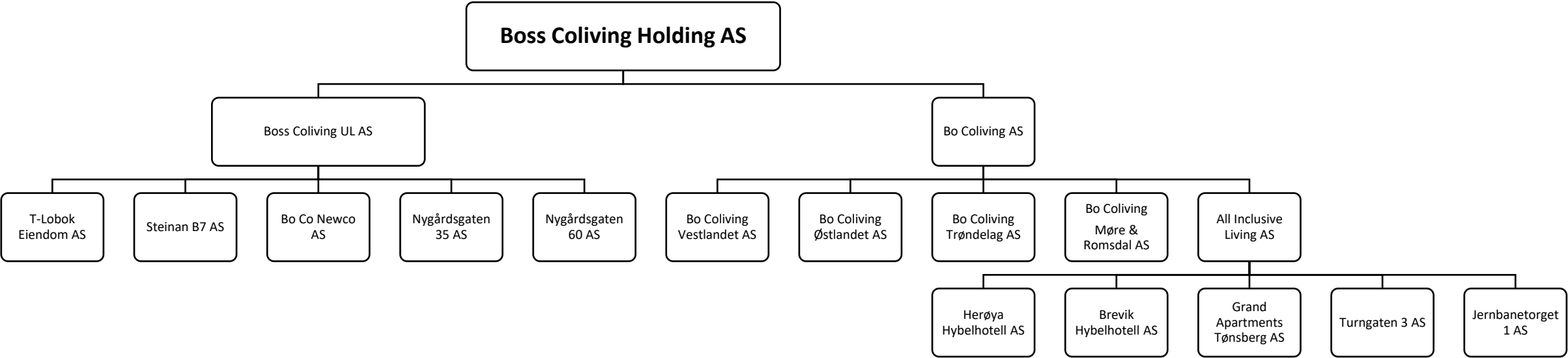
Questions?

Please contact
post@bocoliving.no



Introduction to business activities

Boss Coliving Holding AS operates as a Group and is per 31.12.2024 structured as the figure below:

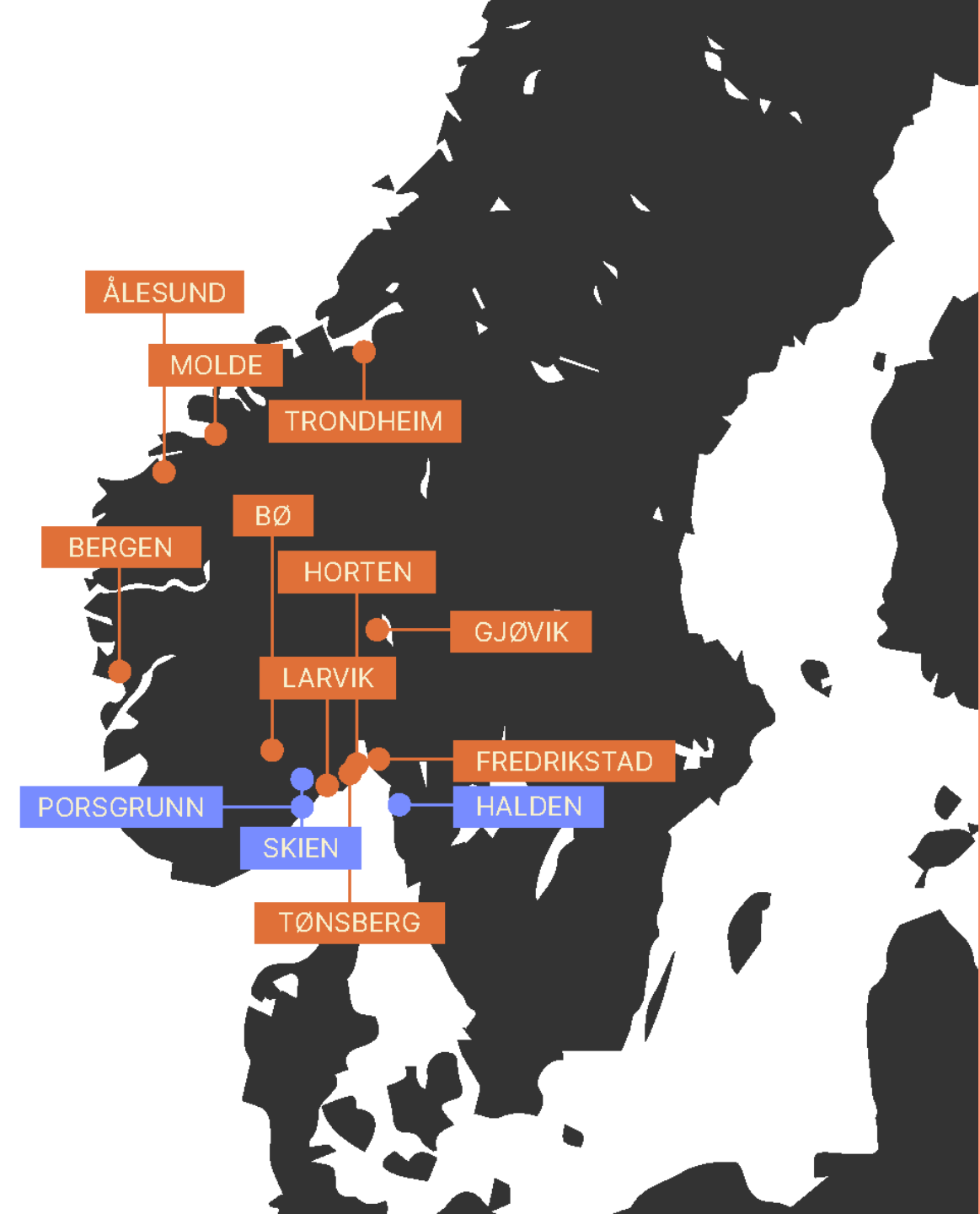


Locations

The Group provides housing to more than 1700 students and young adults, and is present in the following cities in Norway:

- **Bergen**
- **Fredrikstad**
- **Horten**
- **Molde**
- **Trondheim**
- **Ålesund**
- **Bø i Telemark**
- **Gjøvik**
- **Larvik**
- **Skien**
- **Tønsberg**

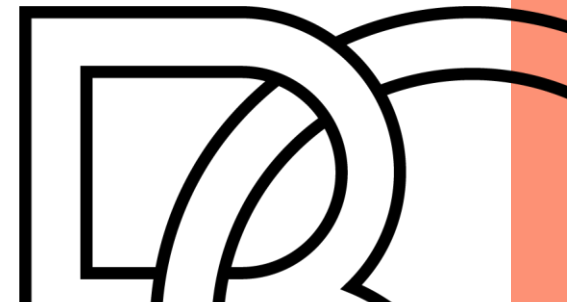
In additions to housing for students and young adults, the Group offers also affordable dormitories for rent, mostly towards the B2B market in the vicinity of business parks in Brevik, Fredrikstad, Halden, Porsgrunn & Tønsberg.



Introduction to guidelines and policies

Bo Coliving has formalized routines and guidelines that addresses elements from the Norwegian Transparency Act. The reference is made primarily to the board resolution on compliance with the Transparency Act and the OECD's guidelines for fundamental human rights and decent working conditions. The responsibility for the Company's obligations under the Transparency Act is thus rooted in the Board of Directors and operationalised through the Company's management. Supplier evaluation is carried out based on an overall assessment of the supplier's reputation, relationship, and expertise. Bo Coliving maintains close dialogue with its suppliers and makes extensive use of well-known players and long-term contractual and collaborative relationships. Supplier monitoring is mainly carried out through dialogue with suppliers.

The Company has a number of policies and routines that are used within the Group that are relevant to the Norwegian Transparency Act, some of which are Code of Conduct and Employee handbook. In connection to the work on the Transparency Act, the existing procedures and guidelines have been revised to identify concrete measures to improve the coverage, explore, assess and support fundamental human rights and decent working conditions within the Company and throughout the value chain and business relations.



DUE DILLIGENCE

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■ Account of Due Dilligence

Boss Coliving Holding AS has carried out a Due Diligence assessment in accordance with § 4 of the Norwegian Transparency Act and accounts for the Due Diligence in accordance with § 5.

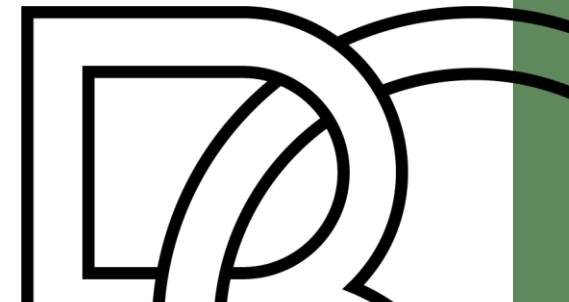
The Due Diligence was carried out at the Group level and included the following companies:

- Boss Coliving Holding AS
- Bo Coliving AS
- Bo Coliving Møre og Romsdal AS
- Bo Coliving Trøndelag AS
- Bo Coliving Vestlandet AS
- Bo Coliving Østlandet AS
- Bo Coliving UL AS
- Bo Co Newco AS
- Nygårdsgaten 35 AS
- Nygårdsgaten 60 AS
- T-Lobok Eiendom AS
- Steinan B7 AS
- All Inclusive Living AS
- Brevik Hybelhotell AS
- Herøya Hybelhotell AS
- Jernbanetorget 1 AS
- Grand Apartment Tønsberg AS
- Turngaten 3 AS

This was considered beneficial, as the all the companies have a number of suppliers and business relations in common and operate within the same sector.

The Company has carried out an analysis of suppliers for 2024 based on global risk indicators on human rights, working conditions, climate and environment, as well as corruption. Out of a total of 565 suppliers, none of the suppliers comes from a country that is categorized as a medium or high-risk country in terms of violations to fundamental human rights and decent working conditions.

As there are several less significant suppliers and single-purchase suppliers, the Company has prioritized the suppliers that account for minimum 80 % of total purchases as well as international suppliers for the Due Diligence. In total, 69 suppliers have been subject to Due Diligence for 2024. Boss Coliving Holding AS has conducted manual supplier control – following a formal process or obtaining signed documentation from each supplier – on 100 % of its prioritized vendors.

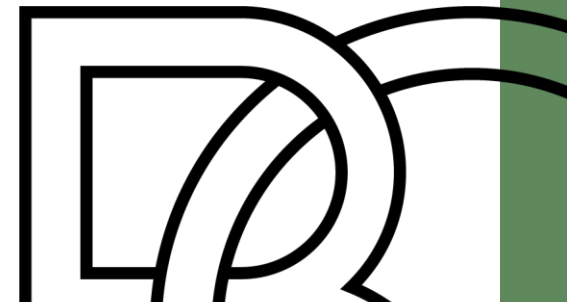


■ Findings and actions

As a part of the Due Diligence, all prioritized suppliers and business relations have been subject to a risk assessment carried out by the Company. All prioritized suppliers and their respective value chains have been assessed for potential violations of fundamental human rights and fair working conditions. Of these, 16 were identified as medium risk, while one was classified as high risk. Additionally, an evaluation of sub-suppliers beyond Tier 1 was conducted. This assessment identified 32 sub-suppliers as medium risk and one as high risk, primarily due to operations in high-risk countries. The companies in the Bo Coliving group have no knowledge of any actual potential or negative consequences in their value chain.

In 2025, Bo Coliving AS distributed a supplier declaration to 18 of its most significant suppliers to ensure alignment with the Company's general principles on fundamental human rights and decent working conditions. At the time of this report's publication, ten suppliers have already responded and signed the declaration, with follow-up efforts underway for the remaining suppliers.

Boss Coliving Holding AS will continue with its already established supplier control and consider updating existing routines and procedures. The Company will maintain a frequent dialogue with its most significant suppliers. No further measures are sought for 2025.



Signature by Management and Board

The report is read and approved by the Company's management and board:

Signed by:

Hans Stenseng

Hans Stenseng

Chief Operating Officer

Signed by:

Svetlana Krasimirova Krasteva

Svetlana Krasimirova Krasteva

Board member

DocuSigned by:

Håvard Reigstad Skogvoll

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Håvard Reigstad Skogvoll

Chairperson

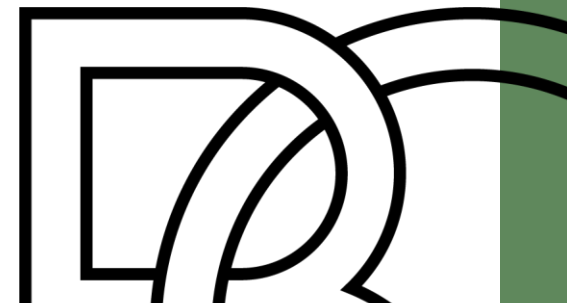
DocuSigned by:

Anthony Peter Smedley

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Anthony Peter Smedley

Board member



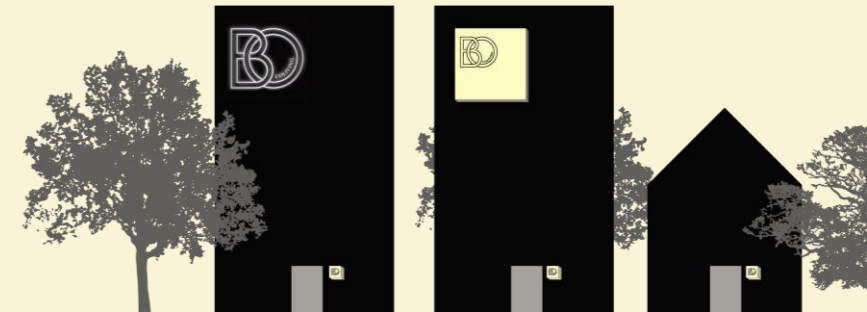
Contact information

For more information on the Norwegian Transparency Act for Boss Coliving Holding AS and its subsidiaries, please contact:

Hans Stenseng, Chief Operating Officer
E-mail: hans@bocoliving.no

Useful links:

- [the Norwegian Consumer Authority](#)
- [Transparency Act Online](#)





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