

Yutong Bus (Norway) AS Due Diligence Report 2025

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Background

The Norwegian Transparency Act, in force since 1 July 2022, is a law that obligates companies of a certain size to report on their due diligence and ensures public access to information about how this is addressed. This includes information on how the companies ensure respect for fundamental human rights and decent working conditions in their own operations and throughout their supply chains. The Transparency Act aligns closely with the United Nations (UN) Sustainable Development Goals by reinforcing global expectations for responsible business conduct, particularly within goals related to human rights, decent work, and sustainable economic activity.



This report provides transparency on how Yutong Bus (Norway) AS works with due diligence in line with UN Guiding Principles on Business and Human Rights (UNGPs) and the Organisation for Economic Co-operation and Development (OECD) Guidelines. Yutong Bus (Norway) AS is not required to report according to the Transparency Act for 2025, and therefore this report is not mandatory. However, the company sees the value of this work and has therefore decided to complete this report regardless. For 2026, on the other hand, due diligence reporting according to the Transparency Act is required.

About the business and its business practices

Yutong Bus (Norway) AS (<https://no.yutong.com/>) is a young company, started in October 2025. Yutong Bus (Norway) AS is a subsidiary of Yutong Bus Co., Ltd. which produces buses and is based in Zhengzhou City, Henan Province, China. Yutong Bus (Norway) AS is engaged in the sale of Yutong buses and spare parts, as well as the repair and maintenance of Yutong buses. Our customers are the Norwegian private and public transport sector.

Activities in 2025 include start-up of the company and sales of Yutong buses.

In 2026 new buses will be delivered to the customers and a new workshop will be launched in Vestfold (Borgeskogen 59, 3160 Stokke) in the first half of 2026.

Headcount is projected to grow from 0 in 2025 to 26 in 2026. QMS (quality management system) development is on track, with quality, HSE, and sustainability being embedded across the business. We are targeting ISO 9001 and 14001 certifications by mid-2027.

Our policies and procedures

Yutong Bus (Norway) AS is aimed to achieve best-in-class performance in due diligence and sustainability. To this end, we have established clear strategies, plans, and dedicated policies and guidelines, all formally adopted by senior management. These frameworks apply not only to our own but also across our supply chain and business partner network.

We set high standards for our suppliers. In line with our responsible procurement policy, we expect them to operate with integrity, maintain effective management systems, and continuously raise the bar on sustainability. Full compliance with all applicable laws and regulations of Yutong Bus (Norway) AS is non-negotiable. We actively prioritize suppliers who demonstrate outstanding social and environmental responsibility.

Suppliers are subject to regular evaluation and audit; those found non-compliant must implement corrective actions.

Transparency is at the core of our operations. Yutong Bus (Norway) AS is open about commitments, the challenges we face, and the measures we take to address them.

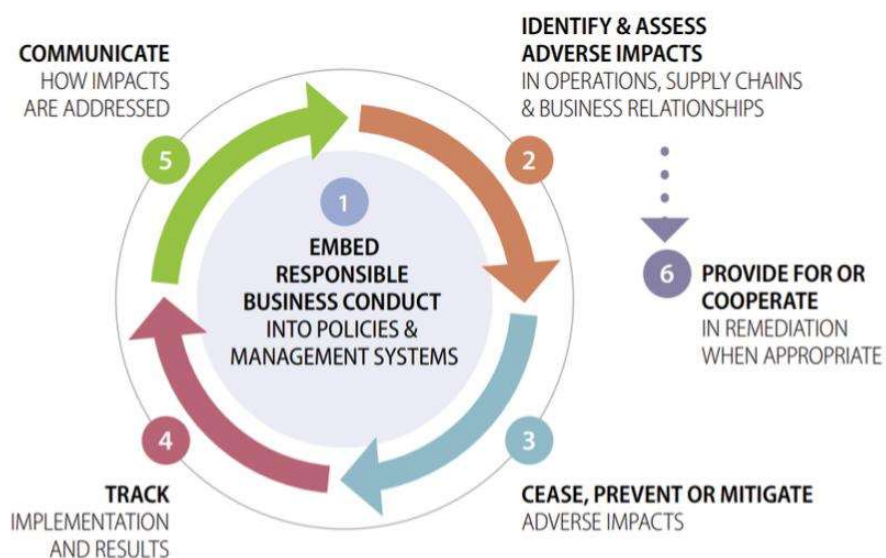
The following policies outline the stance of both Yutong Bus Co., Ltd. and Yutong Bus (Norway) AS:

- Yutong Business Code of Conduct
- Supplier Code of Conduct
- Environmental Management Policy
- Information and Privacy Security Policy
- Labor Rights Policy
- Occupational Health and Safety Policy
- Internal Responsible Procurement System SOP

Complementing these policies, additional internal SOPs and operational documents provide more granular guidance for day-to-day activities.

Our commitment to respecting human rights and promoting decent work standards is implemented in accordance with the UN Guiding Principles on Business and Human Rights (UNGPR) and the OECD Due Diligence Guidance for Responsible Business Conduct (figure 1). This ongoing process comprises six key steps:

1. Anchor responsibility for respecting human rights in policies and management systems.
2. Identify and assess adverse impacts based on our own operations, supply chain, and business partners.
3. Cease, prevent, or mitigate adverse impacts.
4. Monitor implementation and results.
5. Communicate on how impacts are addressed.
6. Provide for or cooperate on remediation where required.



Due Diligence Assessment and Findings

Our due diligence processes are structured around three core pillars:

- Mapping and identifying risks of human rights violations and unacceptable working conditions
- Implementing measures to mitigate, and manage adverse impacts
- Monitoring the effectiveness of these measures and tracking outcomes

All workers, whether directly employed by us or working within our supply chain, shall have decent working conditions in line with UN conventions and national labor legislation. Goods delivered to Yutong Bus (Norway) AS must be produced in full compliance with the requirements of the Transparency Act, as detailed in the “Yutong Bus Labor Rights Policy”.

We have also adopted a “Yutong Business Code of Conduct” and a “Supplier Code of Conduct” which apply to us and all our suppliers alike. Our expectations are communicated in writing to suppliers and business partners, and include:

- Supply chain partners are required to comply with the labour, human rights, environmental, and business ethics requirements set out in our supplier code of conduct, and supply chain partners are required to sign the Social Responsibility Terms.
- Yutong Bus (Norway) AS will continuously evaluate suppliers' performance against the Code, and actively prioritize those demonstrating strong ESG (Environmental, Social, Governance) performance.
- Should a supplier be found in breach of the Code or fail to meet the minimum requirements within a specified timeframe, Yutong Bus (Norway) AS may decline to enter into new contracts or terminate existing agreements.

The principal supplier of Yutong Bus (Norway) AS is Yutong Bus Co., Ltd. ([Yutong Bus | Global Leader Of New Energy Buses](#)).

Yutong Bus Co., Ltd. is a leading global electric bus manufacturer and has exported nearly 130,000 buses to more than 100 countries and regions, capturing over 10% of the global market share.

Yutong Bus Co., Ltd. holds the following certifications (additional certifications are listed in Yutong-sustainability reports):

- ISO 9001 (Quality Management System)
- IATF 16949 (Automobile Quality Management System Standard)
- ISO 14001 (Environmental Management System)
- ISO 45001 (Occupational Health and Safety Management System)
- ISO 50001 (Energy Management System)
- ISO/IEC 27001 (Information Security Management System)
- ISO/IEC 27701 (Privacy Information Management System)
- UN R155 (Cyber Security and Cyber Security Management System)

Life Cycle Assessments (LCAs) have been conducted for all modules scheduled for delivery in 2026, in accordance with ISO 14040 and 14044.

Yutong Bus Co., Ltd. has an agreement with the world's leading manufacturer of batteries for electric vehicles and energy storage system.

The battery manufacturer holds the following certifications:

- ISO 9001 (Quality Management System)
- IATF 16949 (Automobile Quality Management System Standard)
- ISO 14001 (Environmental Management System)
- ISO 45001 (Occupational Health and Safety Management System)
- ISO 50001 (Energy Management System)
- ISO/IEC 27001 (Information Security Management System)

Both suppliers place strong emphasis on environmental responsibility and are committed to reducing their environmental footprint as further detailed in their respective ESG reports.

Sedex Members Ethical Trade Audit (SMETA) 4 pillars audits conducted for the suppliers Yutong Bus Co., Ltd. (tier 1) and the battery manufacturer (tier 2) have been evaluated by Yutong Bus (Norway) AS. Based on these audits, we have performed due diligence risk assessments and mapped the relevant downstream supply chains, including Tier 2 suppliers to Yutong Bus Co., Ltd. and Tier 3 raw material suppliers to the battery manufacturer.

These suppliers are primarily based in China, with certain bus components sourced from Germany and Spain, and the lithium for our bus batteries sourced from Chile.

The focus of the due diligence risk assessments has been human rights, decent working conditions and environment, including the following categories:

- Forced labor
- Child labor
- Discrimination
- Living wages
- Working time regulations
- Excess overtime
- Freedom of association
- Right to collective bargaining
- Corruption
- Health and safety
- Environmental management
- Non-compliance with local laws and regulations
- Violation of the right to privacy

The lithium-ion bus batteries used in Yutong electric buses are produced by the battery manufacturer and do not contain the raw material cobalt, a raw material whose mining has been linked to grave human rights abuses, including unsafe working conditions, child labour and forced labour, as well as environmental degradation.

While our buses are purchased from Yutong Hong Kong, our producer and supplier is Yutong Bus Co., Ltd., our parent company. This relationship gives us valuable visibility into our supply chain and daily operations, and consequently, significant influence over this key supplier.

SMETA audits have been performed by the 3rd party auditing company Intertek for Yutong Bus Co., Ltd. (March 2025) and TUV for the battery manufacturer (December 2024 and November 2025).

SMETA is the world's most widely used social audit framework. It helps understand the standards of labor, health and safety, environmental performance, and business ethics, both in their own operations and at supplier sites. The SMETA audit is designed to help protect workers from unsafe conditions, overwork, discrimination, low pay, and forced labor ([SMETA Audit: The Global Standard for Social Audits | Responsible Sourcing & Ethical Practices](#)).

The following topics were covered in the SMETA audit:

- Site details
- Worker analysis
- Worker interviews
- Measure workplace impact
- 0. Enabling accurate assessment
- 1. Employment is freely chosen
- 1.A. Responsible recruitment and entitlement to work
- 2. Freedom of association and right to collective bargaining are respected
- 3. Working conditions are safe and hygienic
- 4. Child labor shall not be used
- 5. Legal wages are paid
- 5. Living wages are paid
- 6. Working hours are not excessive
- 7. No discrimination is practiced
- 8. Regular employment is provided
- 8.A. Sub-contracting and homeworkers are used responsibly
- 9. No harsh or inhumane treatment is allowed
- 10.A. Environment 2-Pillar
- 10.B. Environment 4-Pillar
- 10.C. Business ethics

Our audits confirmed that no instances of forced labor, child labor, discrimination, corruption, or privacy violations were identified. Workers were paid living wages, and exercised their rights to unionize and to collective bargaining, in accordance with applicable Chinese law. The suppliers also maintain robust environmental management systems, holding ISO 14001 and ISO 50001 certifications.

However, our analysis did identify some risks within our wider supply chain.

Adverse impacts and significant risks identified

Some risks were identified in 2025 audits for a tier 2 supplier, including working time regulations and overtime.

Measures to reduce risk

Significant negative impacts on people, animals, society, and the environment are always first priority. Effective response to negative impacts includes ceasing, preventing or mitigating negative impacts.

Yutong Bus (Norway) AS has internal procedures in place to ensure that any identified negative impacts or risks through our business relationships (e.g., suppliers) are handled. We will use our leverage to the fullest extent possible to ensure that partners also cease, prevent, and mitigate such impacts.

Yutong Bus Co., Ltd. is communication with the tier 2 supplier regarding the identified risks. As the customer, they will follow up with this supplier to ensure that mitigating actions are implemented in order to reduce any negative impacts.

Follow-up and further work

Goals for due diligence work for 2026:

- 1) Update the supplier overview and perform initial mapping of aftermarket suppliers used by the Vestfold workshop (opening in 2026).
- 2) Evaluate additional tier 2 suppliers of Yutong Bus Co., Ltd.
- 3) Ensure follow up with the tier 2 supplier on findings from SMETA audit performed in 2025.

The due diligence risk assessments associated with our business and the products we sell are updated at least annually, or in connection with major changes in the supply chain.

Contact

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Signature of the board

7/1/2026

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Yuan Songsong

Date Songsong Yuan – Board Chairman

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