

Reference:

Transparency Act ('Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions')
Åpenhetsloven ('Lov om virksomheters åpenhet og arbeid med grunnleggende menneskerettigheter og anstendige arbeidsforhold')

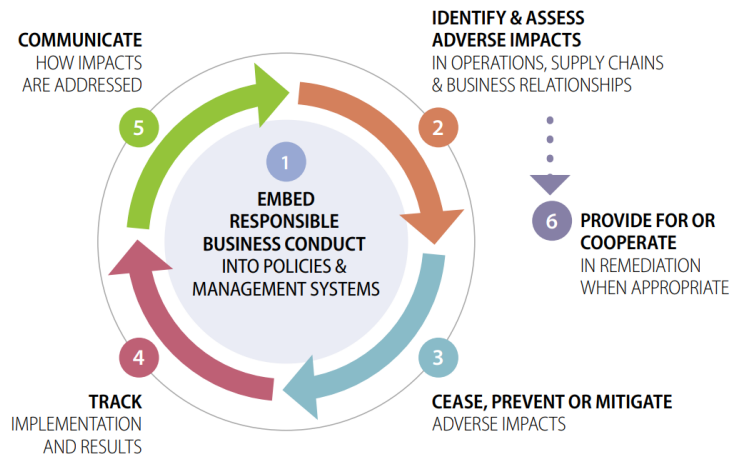
Background

Historically, we have operated in the UK and Scandinavia, countries that are considered as relatively low-risk areas regarding human rights.

As our business expands globally, and our suppliers to a larger extent are fabricating components globally, a higher focus on fundamental human rights and decent working conditions is needed.

Due Diligence for responsible business conduct

In accordance with the Transparency Act, a due diligence has been conducted, following the OECD six-step process:



Step 1: "Embed responsible business conduct"

The 'Code of Conduct' is published internally on SharePoint and at our website. It states the policies for maintaining high ethical standards and integrity.

Responsible business conduct is embedded in policies and in the management system and covered aspects that are relevant for own operations, supply chain, and other business relationships.

Step 2: "Identify and assess adverse impacts"

We have undertaken a broad scoping exercise to identify areas of the business, its operations and relationships, including supply chains, where risks are most likely to be present and most significant. The risks have been structured in sector risks, product risks, geographical risks, and enterprise risks.

Step 3: "Cease, prevent or mitigate adverse impacts"

Preventive actions are based on the responsible business conduct risk assessment.

Step 4: "Track implementation and results adverse impacts"

The following measures are taken:

- Whistle-blower function
- Reporting routines own personnel
- Reporting of complaints and nonconformities
- Response time for inquiries
- Audits

Step 5: "Communicate how impacts are addressed"

As required in the Transparency Act, §5, relevant information will be made available in accordance with the law.

Step 6: "Provide for or cooperate in remediation when appropriate"

If we identify that the company has caused or contributed to actual adverse impacts, such impacts shall be addressed by providing for or cooperating in their remediation.

Further details will be made upon request as defined in the Transparency Act, §5.