

HUMAN RIGHTS AND TRANSPARENCY



HUMAN RIGHTS AND
TRANSPARENCY ACT REPORT

2025

1. Introduction

1.1. About the Transparency Act

The Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (the Transparency Act, hereafter named the Act) entered into force on 1st July 2022 in Norway. The Act shall *"promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and ensure the general public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions."*

The Act applies to larger enterprises that are resident in Norway and that offer goods and services in or outside Norway. Kitron ASA and Kitron AS fall under the category "larger enterprises" in this context. This means that Kitron ASA and Kitron AS have three duties under the Act:

1. Carry out due diligence in accordance with the OECD Guidelines for Multinational Enterprises on a yearly basis.
2. Account for the due diligence by publishing an updated report on the company's website.
3. Give information about how Kitron addresses actual and potential adverse impacts upon written request from any internal or external stakeholder.

1.2. About the Report

This report details the work of Kitron ASA and its subsidiaries, including Kitron AS, in due diligence on fundamental human rights and ensuring decent working conditions.

The report covers the period from 1. January to 31. December 2025.

It is the Group Board of Directors in Kitron ASA and Board of Directors in Kitron AS who bears the ultimate responsibility for the due diligence account. The report is discussed and approved by the Board in both Kitron ASA and Kitron AS.

This report was approved by the Group Board of Directors in Kitron ASA on 10.06.26 and the Board of Directors in Kitron AS on 10.06.26. See signatures below/on page 10.

1.3. Contact information

For further information about Kitron ASA and Kitron AS's work on human rights and decent working conditions, please contact info@kitron.com.

2. About Kitron

Kitron is a leading Scandinavian Electronics Manufacturing Services (EMS) company, listed on the Oslo Stock Exchange.

Established in the early 1960s, the company has grown to become a leading Scandinavian Electronics Manufacturing Services (EMS) company producing electronics. Kitron manufactures and delivers anything from fully assembled electronic circuit boards to complete end products for customers globally. Kitron also offers related technical services such as prototyping, industrialisation, material analysis, and test development, which are key competencies of the company.

Headquartered in Billingstad, Norway, Kitron Group employs approximately 3090 full time employees (FTE) worldwide, with operations in Norway, Sweden, Denmark, Lithuania, Germany, Poland, the Czech Republic, India, China, Malaysia and the United States. Kitron AS employs approximately 536 FTEs of the total 3090 FTEs working at Kitron and has operations in Arendal.

Kitron entered into an agreement to acquire DeltaNordic in November 2025, and the acquisition was approved in December 2025. DeltaNordic is a supplier of electronics and advanced electrical systems for the defence sector as well as sectors such as mining, construction, and infrastructure. As the transaction became effective on 12 January 2026, the acquisition falls outside the scope of the human rights due diligence work conducted for the 2025 reporting period. Accordingly, the operations of DeltaNordic, now part of Kitron, will be covered in our 2026 report.

Kitron's Corporate Executive Management is accountable for the Group's strategy, development, and daily operations. This includes ensuring compliance with laws, regulations, and our Ethical Code of Conduct, as well as implementing effective initiatives to achieve objectives.



3. Our approach to human rights

Kitron opposes all forms of forced and compulsory labour, child labour, discrimination, trafficking, and the purchase of sexual services. Kitron shall not engage in or support the use of child labour in any form. Kitron does not tolerate discrimination of any kind, whether based on race, nationality, gender, sexual orientation, or religion

As a UN Global Compact signatory, Kitron supports the ten UN Global Compact principles. All sites across Kitron shall also comply with the UN Universal Declaration of Human Rights, the UN Convention on the Rights of the Child, and the International Labour Organisation Conventions (ILO conventions).

The annual risk mapping and human rights due diligence are conducted in line with the OECD's guidance for responsible business conduct, which presents a six-step approach, and cover Kitron's own operations, supply chain and business partners.

1. Embed responsible business conduct into policies and management systems
2. Identify and assess adverse impacts in operations, supply chains and business relationships
3. Cease, prevent or mitigate adverse impacts
4. Track implementation and results
5. Communicate how impacts are addressed
6. Provide for or cooperate in remediation when appropriate

The sections below detail how we address each step of the OECD's due diligence model.



3.1. Embed responsible business conduct into policies and management systems

Kitron's policy, guidelines and procedures related to human rights and decent work conditions are stated in the following documents and management procedures:

- Ethical Code of Conduct
- Supplier Code of Conduct
- Whistleblowing policy
- Responsible Sales Policy
- Health Safety, Security and Environmental Policy

The above documents, with the exception of the Health, Safety, Security and Environmental Policy, are made publicly available through Kitron's website: [About Us | Kitron](#)

3.1.1. Ethical Code of Conduct

The Ethical Code of Conduct (CoC) presents Kitron's obligation and commitment to ethical business practices and describes the standards and requirements that Kitron employees must adhere to in their work. The CoC provides a framework to ensure that Kitron complies with relevant local and international legislation, acts in accordance with internal policies and the company's values, and supports the UN's initiatives on human rights, children rights and labour conventions.

The Ethical CoC applies to all Kitron board members, elected officers, permanent and temporary employees, hired staff, consultants and agents acting in or on behalf of Kitron. The CoC also applies to all contractors, sub-contractors, suppliers, and sub-suppliers.

3.1.2. Supplier Code of Conduct

In all activities, Kitron's suppliers must comply with applicable legislation, rules, and regulations in the countries in which they operate. Our suppliers are expected to support the UN's Universal Declaration of Human Rights and ensure that they are not complicit in human rights abuse.

In addition to the Ethical CoC, Kitron has established a Supplier CoC for suppliers and business partners. The Supplier CoC clearly communicates Kitron's expectations regarding labour rights, health and safety, the environment, and anti-corruption. In cases where legislation, rules, or regulations conflict with the Kitron Supplier CoC, the highest standard shall be applied.

Suppliers are expected to communicate the requirements of the Supplier CoC to all appropriate employees, suppliers or sub-contractors engaged in their supply chain. Suppliers should take steps to ensure that their suppliers and subcontractors comply with the requirements of this CoC. Suppliers should also provide means for employees to report on or discuss non-compliance confidentially.

3.1.3. Supplier management

Kitron strives to the highest standards in selecting our suppliers, ensuring that products and services meet stringent quality requirements. Our approach to supplier management is to partner with larger suppliers who demonstrate robust governance and compliance with ethical standards. The primary commitment to customers is to be their long-term, sustainable partner. Kitron is dedicated to sustainable development and expects the same commitment from its suppliers.

Kitron’s due diligence process is illustrated below and is the same for all locations across the Kitron Group, including Kitron AS.

3.1.4. Whistleblowing procedures

All conditions that give rise to ethical issues or matters that could involve a breach of laws and which may cause legal liability, loss of value or reputation for Kitron should be reported. Kitron’s staff has an obligation to report any criminal acts, harassment, discrimination, or circumstances where life or health might be in danger. For external parties, a report can be sent directly to the Chairman of the Group Ethics Committee, here: whistleblowing@kitron.com.

Reporting may be done anonymously, but open reporting will normally facilitate a more expedient resolution of the matter. Kitron will not tolerate any form of retaliation against any person who has raised an ethical or legal concern in good faith, in line with Norwegian law. This applies even if the report does not turn out to be an actual violation. All reports of

concern made in Kitron will be taken seriously and every report will be handled with confidentiality.

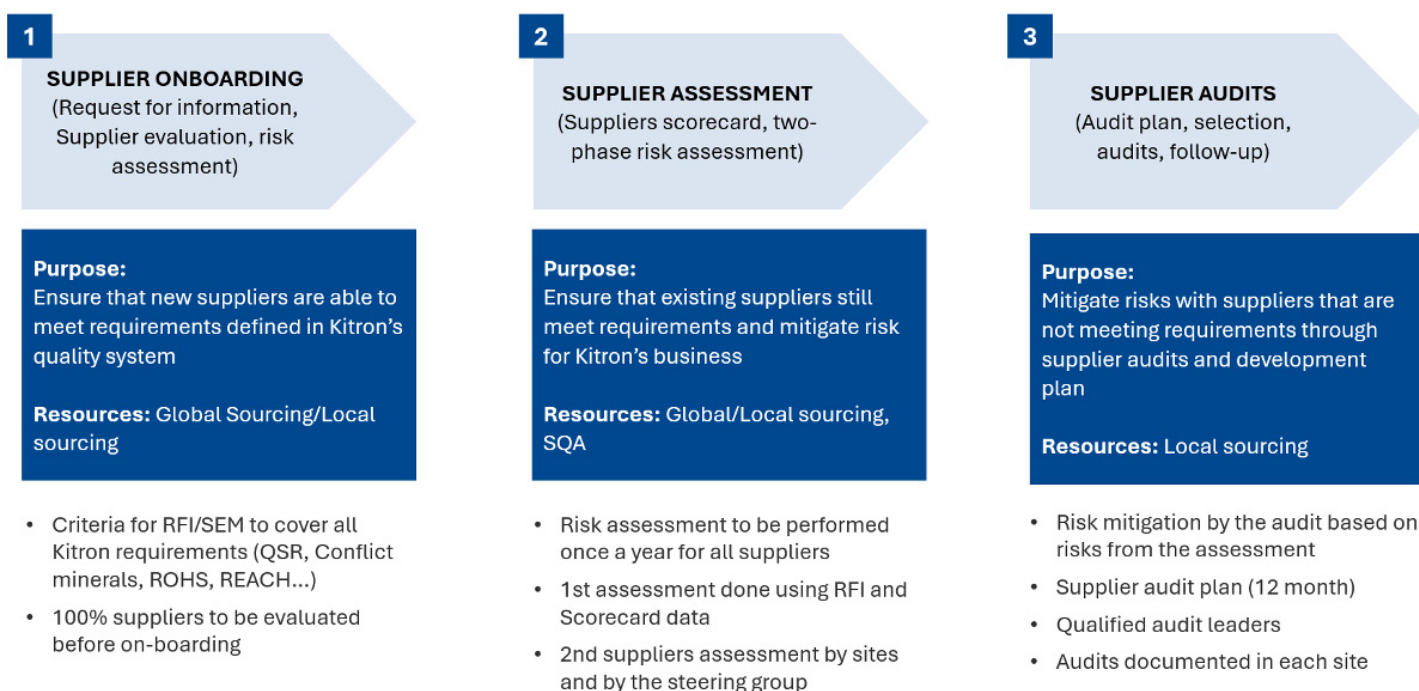
Kitron’s whistleblowing routines contain detailed procedures for handling reports and can be found on the company’s website: <https://kitron.com/about-kitron#ethical-guidelines>.

3.1.5. Responsible Sales Policy

We strive to work with reputable business partners who are of known integrity and whose conduct meet our standards as outlined in our Code of Conduct. We do not engage in manufacturing products supporting production or distribution of anti-personnel mines, cluster munition, biological chemical, or nuclear weapons.

3.1.6. Health Safety, Security and Environmental Policy

Kitron has established a Health, Safety, Security and Environmental (HSSE) Policy, which outlines the company’s commitment to upholding high standards across all its operations. The policy sets out fundamental principles for safeguarding the health and safety of employees, promoting environmental responsibility, and managing HSSE risks through a risk-based approach. It further addresses compliance with applicable legal requirements and alignment with recognised international standards, including ISO 45001 and ISO 14001, as well as requirements for training and competence, continuous improvement, and emergency preparedness and response. The policy applies to all Kitron employees and operations worldwide.



3.2. Identify and assess adverse impacts

Kitron identifies and assesses potential and actual human rights issues across our operations, supply chains and business partners in line with OECD Guidelines for Multinational Enterprise. We are committed to ethical business practices, with the goal of minimising negative impacts arising from our operations, supply chain, and business relationships. Kitron operates globally in countries representing varying level of risks related to human and workers' rights violations. These risks are factored into Kitron's annual risk mapping and due diligence assessment, considering both the severity (scale, scope and irremediability) and likelihood of negative impact based on our current knowledge. Below, we outline significant human rights risks identified through our due diligence process within our workforce, supply chain, and business relationships.

Own workforce

Kitron has identified working conditions and health and safety as areas with significant inherent risks related to our workforce. This is due to operating in countries where the inherent risks of adverse impacts are generally considered high. The inherent geographic risks are significantly lower for Norway and Kitron AS; however, an intrinsic workplace risk remains. Kitron also experiences fluctuations in customer demand, including periods of high demand such as those experienced in 2025, which may lead to increased workload and unintended adverse impacts on working conditions, particularly for vulnerable groups. In addition, there is an inherent workplace risk, especially on the production floor, of accidents and injuries that could negatively affect our workforce.

While these areas are identified as having significant inherent risks, our due diligence process has assessed the residual risk of adverse impacts as low. This assessment reflects the measures we have in place to ensure fair employment practices and a safe, healthy, and satisfactory workplace, as described in further detail in section 3.3. We recognise that risks to our workers may evolve, and we will continue to identify and assess potential adverse impacts on our workforce on an ongoing basis.

Supply Chain

Kitron has identified working conditions, forced labour, child labour, and health and safety as areas with significant inherent risks within our supply chain. Kitron utilises over 2,000 suppliers to deliver products to our customers. The electronics manufacturing supply chain is generally associated with high human rights risks, particularly due to the minerals and metals used in components, which may originate from mines where severe human rights abuses occur. Additionally, we procure from regions where the inherent risks of adverse human rights impacts are high, and the level of transparency in component supply chains varies.

In 2025, Kitron experienced strong growth in demand, particularly within the defence and aerospace segments. This growth outpaced supplier responsiveness in certain areas, leading to challenges in sourcing specific components. In periods of constrained supply, engaging with a wider set of suppliers and intermediaries may be necessary, including counterparties that are less familiar to Kitron. This increases the importance of robust due diligence, as a broader and less well-known counterparty base carries heightened human rights risk.

While Kitron strives to apply the highest standards in the selection of its suppliers and has measures in place to mitigate risks throughout the supply chain (as described in further detail in section 3.3), our due diligence process has assessed the potential risk as medium to high. This assessment reflects limited transparency and traceability in complex supply chains, known risks in the electronics manufacturing supply chain, procurement from regions with high inherent human rights risks, and the component scarcity conditions experienced in 2025.

Business partners

Kitron has identified potential risks in connection with business partners operating in the defence and aerospace sectors. In these sectors, there is an inherent risk of Kitron's output being used for unauthorised activities that negatively impact people. However, we have assessed this risk as medium due to our robust governance on responsible sales and strict adherence to export regulations and sanctions, as detailed in section 3.3.

Kitron has not identified any actual negative impacts we have caused or contributed to in 2025. However, five incidents of discrimination were reported through our whistleblowing channels during the reporting period and are currently under investigation.

3.3. Cease, prevent or mitigate adverse impacts

Kitron has identified risks of negative impact within our own workforce, supply chain and downstream. We work to prevent and mitigate the potential risks we have identified.

Own workforce

Working conditions and health and safety were identified as areas with potential negative impact. Regardless of the residual risk being assessed as low, we employ strategies to mitigate and prevent these impacts, including:

- Applying our Health, Safety, Security and Environment Policy to mitigate risks to health, safety and working conditions across all operations.
- Ensuring compliance with norms and legislations across entities relating to both labour law and health, environment and safety.
- Actively engaging and communicating with our workforce through employee surveys and dialogue with employee representatives. We formally engage our entire workforce once a year through our employee survey. After the survey is conducted, each site assesses the need for additional measures depending on the findings. For Kitron AS, there is formal engagement with union representatives on a set cadence. If and when issues arise, it is always possible to address management directly, and this is handled locally by each site. We depend on attracting, retaining and developing motivated, engaged and skilled employees to achieve our business objectives, and it is therefore a high priority for us to be an attractive employer in terms of benefits, development and working environment.
- Upholding high health and safety standards through a focus on regular training, the use of protective gear, and continuous monitoring and improvement of health and safety.
- Achieving ISO certifications for health and safety standards across multiple locations, including Kitron AS, to ensure compliance with international best practices and continuous improvement in workplace safety.
- Investing in advanced machinery that impacts our workforce positively in terms of safety and physical strain.

Supply chain

Kitron has identified significant inherent risks within its supply chain, and the residual risk is assessed as medium to high. To cease, mitigate and prevent these impacts, Kitron employs several strategies:

- Annual due diligence process of risks associated with our supply chain. This increases the awareness in relevant functions of risks and provides the basis for the upcoming year.
- Supplier selection standards, including requesting information from new suppliers, signing of the Supplier Code of Conduct, and onboarding of suppliers to Kitron's preferred supplier programme or supplier database.
- Expectations towards our suppliers to source minerals from responsible sources and exercise due diligence towards their sub-suppliers to ensure compliance with the Electronic Industry Citizenship Coalition standards.
- 27 supplier audits have been conducted in 2025 where questions relating to social standards were included. Kitron will continue to strengthen the integration of human rights and social conditions into supplier audits going forward.
- Kitron has initiated work to further integrate human rights and social conditions into its supplier management processes. This includes expanding the Supplier Assessment tool and modifying the Supplier Audit Questionnaire (SAQ) to incorporate additional questions on human rights and decent working conditions, with the aim of improving supplier risk management and enabling identification of higher-risk suppliers. Implementation of these tools is ongoing.
- In 2025, Kitron acquired a digital tool for screening all existing and new third parties for risks, including risks related to human rights and working conditions. The tool is expected to be fully implemented in 2026 and will improve the quality and use of supply chain data, strengthening the basis for supplier risk assessments and due diligence decisions.

It is important to note that production is carried out in accordance with our customers' specifications. This entails that Kitron is not always at liberty to source materials from manufacturers other than those directly approved by our customers.

Business partners

We have identified risks associated with business partners operating in the defence and aerospace sectors. To mitigate these risks, we:

- Ensure compliance with applicable laws, regulations and internal requirements as part of our corporate governance system, including strict adherence to export regulations and sanctions.
- Strive to work exclusively with reputable business partners of known integrity, whose conduct meets our standards as outlined in our Code of Conduct.
- Work exclusively with customers in NATO countries and NATO allied countries.

Planned initiatives and measures for 2026

Kitron has initiatives and measures planned for 2026 to prevent and mitigate risks both in our workforce, in our supply chain and with our business partners. This includes:

- Continuing to closely monitor working conditions arising from fluctuations in demand, to ensure decent conditions are maintained for our workforce.
- Fully implementing the revised Supplier Audit Questionnaire (SAQ) and the modified Supplier Assessment tool across our supplier base, with the aim of improving our ability to identify suppliers with elevated social risks and ensuring that such suppliers are subject to enhanced follow-up.
- Formalising roles and responsibilities within our human rights due diligence process to strengthen accountability and ensure effective identification and mitigation of adverse impacts.
- Improving the quality and use of supply chain data, including through enhanced system support and data from third parties, to strengthen the basis for supplier risk assessments and due diligence decisions.
- Continuously assessing the need to revise our procedures on responsible sales, to ensure that our sales practices remain aligned with ethical standards, applicable regulatory requirements, and global developments.

3.4. Track implementation and results

Kitron will continuously track implementation of the above-mentioned ongoing and planned measures. The planned initiatives and measures for 2026 have been reviewed and approved by the board of directors in both Kitron AS and Kitron ASA, and will be communicated to Kitron's Corporate Executive Management, who is accountable for the Group's strategy, development, and daily operations, as well as to Kitron AS leadership. Designated functions within Kitron ASA and Kitron AS will report on the progress of due diligence work and measures to Corporate Executive Management, who will monitor progress and report results to the board of directors in Kitron ASA and Kitron AS, respectively, at least annually as part of the due diligence assessment. Should there be a need to adjust plans or measures, these will be discussed on an ongoing basis by the relevant functions, and Corporate Executive Management will be consulted as necessary.

3.5. Communicate how impacts are addressed

This Human Rights and Transparency Act Report communicates how Kitron identifies and addresses actual and potential adverse impacts on fundamental human rights and decent working conditions across its operations, supply chains, and business relationships. Kitron will communicate regularly on its progress through these reports, as well as through the company's annual sustainability reports.

Upon written request, any person has the right to request information on how Kitron addresses actual and potential adverse impacts on fundamental human rights and decent working conditions. Such requests may be sent to: info@kitron.com.

The right to request information is subject to certain limitations. In particular, information that is classified under the Security Act or protected under the Intellectual Property Rights Act is exempt from disclosure. This ensures that sensitive information which could compromise national security or proprietary interests remains protected, while Kitron's commitment to transparency is upheld in all other areas.

3.6. Provide for or cooperate in remediation when appropriate

Kitron has not identified any actual negative impacts that it has caused or contributed to within its workforce, supply chain, or business relationships in 2025. Should any such impacts be identified, Kitron will provide for or cooperate in remediation when appropriate.

This report was approved on 10 June 2026 by the CEO and Board of Directors of Kitron ASA, the parent company of the Kitron Group.

Oslo, 10 June 2026



Tuomo Lähdesmäki
Chairman



Maalfrid Brath
Deputy Chairman



Michael Lundgaard Thomsen
Board Member



Gyrid Skalleberg Inger
Board Member



Petra Grandinson
Board Member



Ingjerd Livollen
Employee Elected
Board Member



Håkon Ljøstad
Employee Elected
Board Member



Geir Vedøy
Employee Elected
Board Member



Peter Nilsson
CEO of Kitron ASA

This report was approved on 10 June 2026 by the CEO and Board of Directors of Kitron AS, a subsidiary of Kitron ASA.

Oslo, 10 June 2026




Hans Petter Thomassen
Chairman



Mona Cathrin Nylander
Board Member



Henning Dahlen
Board Member



Karin Irene Bendixen
Employee Elected
Board Member (Alternate)



Henrik Bjørn Bøgh
Employee Elected
Board Member



Geir Henriksen
CEO of Kitron AS

Kitron is a leading Scandinavian Electronics Manufacturing Services (EMS) company, delivering improved flexibility, cost efficiency, and innovation power through the value chain.

Kitron is a leading Scandinavian electronics manufacturing services company for the Connectivity, Electrification, Industry, Medical Devices, and Defence/Aerospace sectors. The group is located in Norway, Sweden, Denmark, Lithuania, Germany, Poland, the Czech Republic, India, China, Malaysia and the United States. Kitron has about 2800 employees. Kitron manufactures both electronics that are embedded in the customers' own product, as well as box-built electronic products. Kitron also provides high-level assembly (HLA) of complex electromechanical products for its customers.

Kitron offers all parts of the value chain: from design via industrialisation, manufacturing, and logistics, to repairs. The electronics content may be based on conventional printed circuit boards or ceramic substrates.

Kitron also provides various related services such as cable harness manufacturing and components analysis, resilience testing, or sourcing any other part of the customer's product. Customers typically serve international markets and provide equipment or systems for professional or industrial use.



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