

Transparency Act Due Diligence Report 2025

Introduction

The principles underpinning the Norwegian Transparency Act are closely aligned with Hatteland Technology's core values and are embedded in the way we operate across our organization and value chain. Respect for fundamental human rights, decent working conditions, ethical business practices, and responsible corporate governance guide our decision-making and business activities.

The Norwegian Transparency Act

The Norwegian Transparency Act entered into force on 1 July 2022 and requires companies to identify, assess, prevent, mitigate, and report on actual and potential adverse impacts on human rights and working conditions within their operations, supply chains, and business relationships. The Act is intended to strengthen corporate accountability and promote greater transparency regarding how businesses address these risks.

Hatteland Technology supports the objectives of the Act and is committed to conducting business in accordance with internationally recognized human rights standards and recognized principles of responsible business conduct. As part of this commitment, we carry out due diligence assessments in line with the OECD Guidelines for Multinational Enterprises and the OECD Due Diligence Guidance for Responsible Business Conduct. These assessments help us identify and manage risks while promoting continuous improvement throughout our operations and supply chain.

We view compliance with the Act not only as a legal obligation, but also as an opportunity to strengthen responsible business conduct and create long-term value for our employees, customers, suppliers, and society.

This report summarizes our due diligence processes, key findings, and actions taken during the reporting period from 1 January 2025 to 31 December 2025. It also describes how we fulfil our obligations under the Transparency Act and support ethical and sustainable business practices.

Transparency, traceability, and accountability are central to our approach. Through supplier assessments supported by the IntegrityNext platform, we gain insights into ethical, social, and environmental practices across our supply chain and follow up on identified areas of concern. In accordance with the Act, we also provide relevant information to stakeholders upon request.

For Hatteland Technology, transparency is more than a regulatory requirement—it is a reflection of our values and our commitment to conducting business responsibly and sustainably.

Who are we?

Hatteland Technology is a global technology partner delivering tailored solutions to system integrators and industrial customers across a wide range of industries. Our portfolio includes industrial displays and panel PCs, automation solutions, networking equipment, CCTV systems, and software solutions designed for demanding operational environments.

With a history spanning more than 35 years, Hatteland Technology has established itself as a trusted provider of reliable and innovative technology solutions. The company is wholly owned by Embron Group AS and serves customers worldwide through a combination of local presence, technical expertise, and long-term partnerships. Our primary markets include Marine & Offshore, Transportation, Industrial Automation, Naval & Defense, High Security, and Retail sectors, where reliability, performance, and lifecycle support are critical requirements.

At the time of publication, Hatteland Technology employs over 260 people in eight countries and collaborates with partners across a wide range of additional markets globally. Our headquarters are located in Aksdal, Norway. In addition, we operate production facilities in Lysaker, Norway, and Sollentuna, Sweden, and maintain sales, purchasing, research, and development offices in Finland, Germany, Italy, the United States, and Taiwan.

Our extended management team is based in Norway and Sweden and consists of twelve members (five women and seven men) representing diverse backgrounds, competencies, and areas of responsibility. Diversity, inclusion, equal opportunity, and mutual respect are fundamental principles embedded in our corporate culture, leadership practices, and business guidelines.

Further information about Hatteland Technology is available at www.hattelandtechnology.com.

Our Commitment to Responsible Business Conduct

Hatteland Technology is committed to conducting business responsibly and sustainably by balancing economic performance with environmental stewardship and social responsibility. Our corporate values guide our decisions, relationships, and day-to-day operations, forming the foundation for both internal conduct and our expectations of suppliers, business partners, and other stakeholders.

Responsibility for human rights, environmental protection, health and safety, business ethics, and anti-corruption is embedded throughout the organization and supported by policies, management systems, and governance processes overseen by executive management and the Board of Directors.

Guided by our values – **Dedicated, Skilled and Trusted** – we focus on quality, reliability and long product lifetimes. By delivering robust and durable equipment designed for long-term use, we help reduce environmental impact over the full lifecycle of our products and services.

Vision: A safe, sustainable world, that runs on smart and reliable technology.

Mission statement

We maximize our customer's value proposition by providing innovative, high-quality technology solutions.

Human rights

Hatteland Technology is committed to respecting internationally recognized human rights throughout its operations and value chain. We expect our suppliers and business partners to uphold the same standards and to treat all individuals with dignity, fairness, and respect.

Suppliers are expected to promote equal opportunities, prevent discrimination, support diversity and inclusion, and maintain workplaces free from harassment and abuse. These expectations are aligned with internationally recognized human rights principles and relevant conventions of the International Labour Organization (ILO). Suppliers and business partners must prohibit child labour, forced labour, and all forms of human trafficking within their operations and supply chains.

Environment, Health and Safety

Hatteland Technology is ISO 14001:2015 certified and our sustainability work is aligned with selected UN Sustainable Development Goals. Starting in 2026, we will initiate VSME reporting, with the ambition of setting and aligning our climate targets in accordance with the Science Based Targets initiative (SBTi).

We expect our suppliers and partners to actively manage environmental, health, and safety risks and to promote continuous improvement within these areas. Suppliers are encouraged to implement environmental and occupational health and safety management systems, such as ISO 14001 or equivalent frameworks, to support continuous improvement and compliance with applicable requirements.

Employment practices

Hatteland Technology expects suppliers and business partners to provide fair and lawful working conditions. Employees should be treated with respect and be provided with safe, healthy, and inclusive workplaces free from physical, psychological, verbal, or other forms of harassment. Suppliers are expected to comply with applicable labour laws and regulations relating to working hours, wages, benefits, freedom of association, and non-discrimination.

Anti-corruption

Hatteland Technology maintains a zero-tolerance approach to corruption, bribery, fraud, and unethical business conduct. Partners and Suppliers are required to comply with all applicable anti-corruption laws and regulations and to implement appropriate governance frameworks within their organizations. This includes providing regular and relevant anti-corruption training, particularly for employees and executives in exposed roles.

Partners and Suppliers must not, directly or indirectly, offer, promise, give, solicit, or accept any improper payment, gift, benefit, or advantage intended to influence a decision or secure an unfair business advantage. This applies to, but is not limited to, interactions with private individuals and public officials, including government representatives, political parties, and candidates for public office.

Business decisions must be based solely on the merits of products and services. Any exchange of gifts or business courtesies must be lawful, transparent, reasonable in value, and consistent with generally accepted business practices, and must not violate the rules of the recipient's organization.

Due Diligence Process

Hatteland Technology has established a structured due diligence process to identify, assess, prevent, and mitigate potential adverse impacts related to human rights, labour conditions, health and safety, environmental sustainability, and business ethics.

Our due diligence activities are based on the OECD Guidelines and are aligned with the requirements of the Norwegian Transparency Act. Risk assessments are conducted across relevant business areas and throughout our supply chain. Critical suppliers are reviewed annually, and new suppliers are included as part of our onboarding and monitoring processes.

In 2025, we implemented the IntegrityNext platform to strengthen our environmental, social, and governance (ESG) risk management. The platform enables continuous supplier assessments and monitoring of key ESG topics, including human rights, labour practices, environmental performance, and anti-corruption.

Suppliers are requested to provide relevant documentation and confirm compliance through the platform.

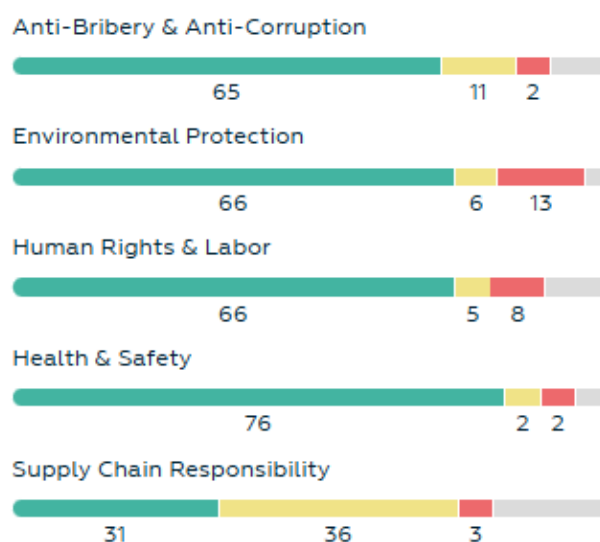
IntegrityNext supports our due diligence efforts by enabling us to:

- Identify and assess potential risks across our supply chain.
- Prioritize suppliers and risks based on severity and business relevance.
- Implement and monitor corrective actions where necessary.
- Support transparency and reporting requirements.

As the implementation is ongoing, supplier onboarding and data collection remain a continuous process. While a significant number of suppliers have been invited to participate and provide relevant ESG information, not all suppliers have yet completed the requested assessments or submitted all required documentation. Consequently, some areas of our supplier's data remain incomplete.

We continue to engage with suppliers to improve response rates, increase transparency, and strengthen the quality and coverage of ESG-related information across our supply chain. We expect the completeness and effectiveness of our due diligence assessments to improve as supplier participation increases and the platform becomes further integrated into our procurement and supplier management processes.

The chart below summarizes the results of supplier assessments conducted through the IntegrityNext platform and provides an overview of the maturity and compliance status of suppliers that have completed the assessment process. Overall, the findings indicate a generally positive level of compliance across the assessed ESG categories. At the same time, the results highlight areas where additional documentation, supplier engagement, or improvement measures may be required.

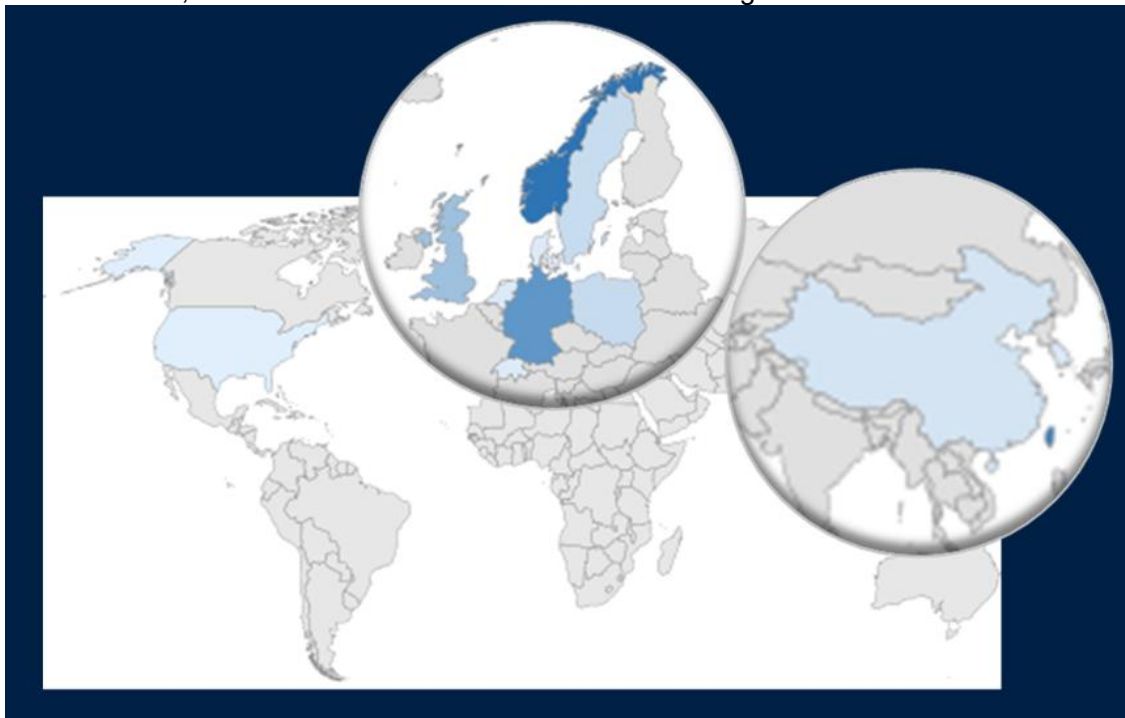


In addition to platform-based assessments, we maintain ongoing supplier dialogue and monitor developments through internal reviews, supplier audits, and risk assessments. Where actual or potential adverse impacts are identified, appropriate follow-up actions are initiated based on the nature and severity of the risk.

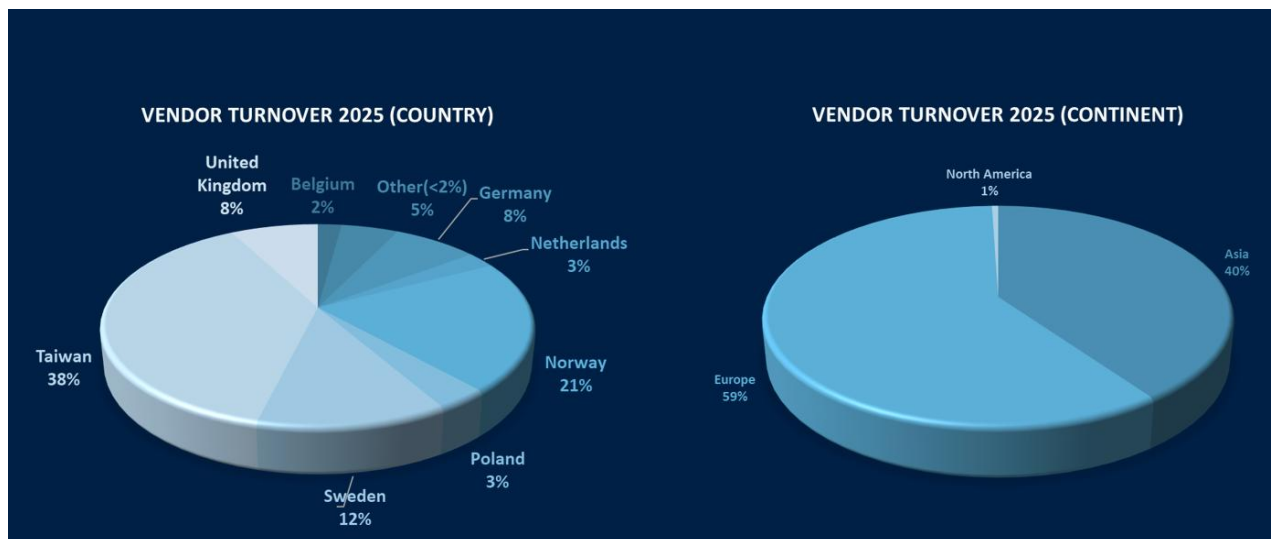
Supplier Footprint

Our geographically diverse supplier base strengthens operational resilience and provides access to specialized capabilities. At the same time, it requires a structured and risk-based approach to

supplier oversight, enabling us to identify and address potential human rights, labour, environmental, and business ethics risks across different regions.



Geographical Insights by Country



Geographical Distribution of Supplier Spend

Risk Assessment and Findings

As part of our due diligence process, Hatteland Technology has conducted risk assessments of its most significant suppliers to identify actual and potential adverse impacts related to human rights, labour conditions, environmental responsibility, and business ethics within our supply chain.

The assessments consider factors such as geographical location, industry sector, supplier type, business criticality, and known country-specific risks. Risks are evaluated based on severity, likelihood, and potential impact, enabling a risk-based prioritization of follow-up activities and mitigation measures.

In addition, Hatteland Technology has completed a Double Materiality Assessment in accordance with the Corporate Sustainability Reporting Directive (CSRD) and conducted lifecycle-related risk assessments for our products. Findings from these assessments are incorporated into our continuous improvement processes and quality management system.

Based on the due diligence assessments conducted during the reporting period, no actual adverse impacts or significant breaches of fundamental human rights or decent working conditions were identified within our direct supplier base. Our assessment indicates an overall low risk profile, supported by long-standing supplier relationships, established supplier requirements, ongoing monitoring activities, and regular supplier engagement. While certain suppliers operate in regions or sectors associated with elevated inherent risk, no issues requiring corrective action were identified during the reporting period.

Future Priorities

Hatteland Technology has established policies, procedures, and governance processes to support compliance with the Norwegian Transparency Act and promote responsible business conduct throughout our value chain.

Our due diligence activities include supplier assessments, ESG monitoring, supplier engagement, and risk-based audits. Suppliers assessed as medium or high risk are subject to enhanced monitoring and prioritized within our audit programme.

Going forward, we will continue to strengthen our due diligence framework through enhanced supplier engagement, regular risk assessments, expanded ESG data collection, and targeted follow-up activities where potential risks are identified. Particular focus will be placed on increasing supplier participation in the IntegrityNext platform and further integrating ESG considerations into procurement and supplier management processes.

Conclusion and Declaration

Hatteland Technology is committed to conducting business in a responsible, transparent, and sustainable manner. During the reporting period, we continued to strengthen our due diligence framework in accordance with the requirements of the Norwegian Transparency Act and the OECD Due Diligence Guidance for Responsible Business Conduct.

Based on the assessments conducted and the information available at the time of reporting, no actual adverse impacts or documented violations of fundamental human rights or decent working conditions were identified within our assessed supplier base.

We recognize that due diligence is an ongoing process requiring continuous monitoring, stakeholder engagement, and improvement. As our ESG programme and supplier assessment

processes continue to mature, we remain committed to enhancing transparency, strengthening risk management practices, and promoting responsible business conduct throughout our value chain. Hatteland Technology will continue to review and improve its policies, procedures, and governance processes to ensure that our business activities contribute positively to sustainable and responsible development.

Contact Information and Information Requests

The Company welcomes inquiries regarding our work on human rights, decent working conditions, and compliance with the Norwegian Transparency Act.

Requests for information pursuant to the Transparency Act, as well as general questions regarding our due diligence assessments and responsible business practices, can be directed to:

Hatteland

Email:

Phone:

Website: www.hattelandtechnology.com

Technology

mail@hattelandtechnology.com

+4748142200

We will respond to requests in accordance with the requirements and timelines set out in the Norwegian Transparency Act.

29.06.2026

Kjell Magne Leirgulen
Board Chairman

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Catharina Broch
Board Member

Liv Vatnedal
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Mette Janitz
Board Member

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