Sustainability statement

1. Disclosure requirement index IRO-2

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2. ESRS 2 General disclosures

2.1. Basis for preparation of sustainability statement BP-1

The statement has been prepared in accordance with the EU's sustainability directive (CSRD) and the associated European standards for sustainability reporting (ESRS). The sustainability statement has been prepared on a consolidated basis. The scope of consolidation is the same as for the financial statements and no undertakings are exempted from individual or consolidated sustainability reporting.

The sustainability statement covers Kitron's upstream and downstream value chain, as well as our own operations.

For an overview and description of our value chain, please refer to chapter 2.10. Accordingly, Kitron's double materiality analysis has taken into account the entire value chain. Kitron's GHG emissions inventory includes scope 3 emissions. In regard to policies for managing sustainability matters in Kitron's value chain the sustainability statement covers both the Ethical Code of Conduct and the Supplier Code of Conduct.

The option to omit specific information corresponding to intellectual property, know-how, results of innovation or the disclosure of impending developments or matters in course of negotiation is not invoked.

2.2. Governance of sustainability matters GOV-1

The Board of Directors

The Board of Kitron ASA has the overall responsibility for safeguarding the interests of all shareholders and other stakeholders, supervise the management of Kitron's operations and overarching business conduct. The Board's responsibilities include overseeing the implementation and effectiveness of relevant policies, such as the Anti-Corruption Policy and the Ethical Code of Conduct. The Board reviews and approves these policies, as well as the annual corruption risk assessment conducted by the Corporate Management Team (CMT) and addresses any matters related to business conduct that are brought to their attention.

Kitron has 8 non-executive board members, three of which are employee-elected members representing the workers (see Table 2 2 below). 100% of the shareholder elected members are independent. The Group Board of Directors bears the ultimate responsibility for Kitron's Sustainability and the annual report including Kitron's sustainability statement is discussed and approved by the Board. The Audit & Risk committee is responsible for overseeing the groups internal controls, risk management and reporting processes. The committee's mandate has been amended to also include sustainability reporting, starting from 2025. Material risks impacts, the implementation of due diligence, as well as performance are reviewed (half-yearly) by the Board. In 2024, all material impacts, risks and opportunities (IROs), see Table 2 8 below, were reviewed by the Board at the Board meeting on 18 November. In 2025, Kitron will consider making adjustments to the Board procedure and the group's annual risk review to fully cover impacts, risks and opportunities according to the definition in the ESRS.

Corporate Executive Management (CMT)

Kitron's Corporate Executive Management has seven members (for composition and identity, see Table 2 2 below). CMT bears the responsibility for the group's strategy, development and day- to-day work. This means CMT is responsible for compliance with legislation and regulations and our Ethical Code of Conduct, for the oversight of impacts, risks and opportunities, as well as for setting targets and the implementation of appropriate and effective initiatives to ensure that we reach our goals. The CFO is responsible for the group's sustainability reporting, for monitoring performance and for overseeing risk management processes in line with Kitron's risk management procedures. Material IROs are included in the groups' ordinary risk management and discussed at least half yearly at CMT meetings. The CMT also monitors performance towards group targets, including our GHG emissions reductions target, regularly. This is done by reviewing the quarterly reports from the sites (see below). In 2025, controls and procedures for the management of material IROs will be evaluated and, if necessary, adjusted to ensure efficiency. To date, there are no specific controls and procedures applied for the management of IROs. Responsibilities regarding impacts, risks and opportunities are not directly reflected in policies and procedures but covered indirectly by the Kitron Risk Management Policy and the Anti-Corruption Policy which both define the CMT as the highest level responsible. Furthermore, the CMT is responsible for conducting an annual integrity risk assessment to identify and prioritize internal and external corruption risks faced by the business. The CMT ensures that all activities within their respective areas are carried out in accordance with the Ethical Code of Conduct

and the Anti-Corruption Policy and is responsible for communicating these policies and for providing guidance on their interpretation and application. Additionally, the CMT conducts integrity due diligence on trading partners in the onboarding process and with a risk based approach, periodically assesses anti-corruption policies and procedures to maintain the organisation's commitment to ethical business practices.

The Sites

The business areas are responsible for follow up and compliance with policy, strategy, targets and governance documents related to sustainability. The day-to-day work with corporate responsibility and environmental management is usually handled by the sites with support from the CMT. Each site makes their own risk review, which is thereafter consolidated on group level. Progress towards targets, including sustainability targets, is reported quarterly to the group CFO through the Group quality and sustainability function.

Ethics Committee

The Ethics Committee, acting on behalf of the CMT, holds several key responsibilities to ensure the organisation's commitment to ethical business practices and anti-corruption measures. The Ethics Committee meets as needed but at least three times a year and consists of members of Kitron's CMT. The Chief HR Officer is the Chairman of the Ethics Committee. The Chairman of the Ethics Committee reports annually to the CEO who in turn reports to the Board of Kitron ASA, among others on the implementation and effectiveness of the organisation's anti-corruption activities. The Chairman of the Ethics Committee has also a direct reporting line to the Audit Committee of the Board. Kitron's Ethics Committee's mandate is to review and suggest updates of guidelines, decide and/or advise in ethical dilemmas and anti-corruption issues, conduct risk analysis, implement relevant actions and make periodical reviews. This includes advising on the Ethical Code of Conduct and other relevant anti-corruption laws, regulations, policies and procedures. The Ethics Committee also performs regular ethical audits, primarily related to anti-corruption, and monitors the development of anti-corruption legislation and other regulatory requirements in countries where Kitron operates or plans to establish activities. This ensures that the organisation remains compliant with evolving legal standards. This includes advising on the Ethical Code of Conduct and other relevant anti-corruption laws, regulations, policies, and procedures

2.3. Identity of Management and Board members and information on diversity and competences

Table 2 1: Identity of management and Board members

Board of Directors	Corporate Executive Management
▪ Tuomo Lähdesmäki, Chairman ▪ Maalfrid Brath, Deputy Chairman ▪ Petra Grandinson ▪ Michael L. Thomsen ▪ Gyrid Skalleberg Ingerø ▪ Jarle Larsen, employee elected Board member ▪ Henriette Stene, employee elected Board member ▪ Tone Aas, employee elected Board member	▪ Peter Nilsson, CEO ▪ Cathrin Nylander, CFO (Finance, HR, IT) ▪ Kristoffer Asklöv, COO (Sales and Operations) ▪ Stian Haugen, CTO (Digitalization & Technology) ▪ Hans Petter Thomassen VP Nordics and NA ▪ Mindaugas Sestokas VP CEE ▪ Zygimantas Dirse, VP Asia

The Board has diverse educational and professional background, where most of the members are educated within the fields of engineering, accounting and business, or electronics. 63% of Board members are female, and all members are over the age of 50 years.

The CMT has diverse educational and professional background, spanning from the natural sciences to social sciences and business management. A majority of the CMT members are educated within the fields of engineering or computer science, and 86% of the CMT members are male. 43% of CMT members are between the age of 40 and 50 and 57% are more than 50 years old.

Table 2 2: Gender diversity of Board and Corporate management team

	Male	Female	Total	Male (%)	Female (%)
Non-Executive Board	3	5	8	37.5%	62.5%
Shareholder elected	2	3	5	40.0%	60.0%
Employee elected	1	2	3	33.0%	67.0%
Corporate management team	6	1	7	85.8%	14.2%

2.4. Skills and competence of Board and Management

Kitron has mapped the competencies of the CMT and Board regarding the sectors, products/ services and geographic locations where Kitron operates, as well as Kitron's material IROs. Results are shown in figures and tables below. Overall, the CMT and Board's competences are good and adequate, and, in addition to their own competences and access to Kitron's inhouse sustainability experts, they have access to external expertise on sustainability matters through various industry- and sustainability related organizations and Kitron's external sustainability advisors. In 2025, training will be conducted to further develop the CMT and Board's competences, e.g. regarding climate and workers in the value chain, respectively.

Table 2 3: Findings from competence mapping – Kitron's sectors, products, and geographic locations.

	Level of competency (Average response)	
Sectors, products and geographic locations	**Kitron's Board**	**Kitron's corporate management**
Electronics Manufacturing Services	3,1	4,0
Industrial manufacturing in general	3,6	4,0
Electronics - development and design	2,9	2,6
Electronics - manufacturing	3,4	4,0
Electronics - Industrialization	3,0	3,7
Electronics - Maintainance and repairs	2,9	3,4
Nordics	3,5	3,4
Central Eastern Europe	3,1*	3,6
North America	3,1*	3,4
Asia	2,9*	3,3

*only 7 responses
Scale: 1 – No experience 2 – Limited experience 3 – Familiar with 4 – Practiced experience

Table 2 4: Findings from competence mapping – Sustainability topics

	Level of competency (Average response)	
Sustainability topics	**Kitron's Board**	**Kitron's corporate management**
Greenhouse gas emissions / climate change	2,5	3,9
Renewable energy	2,5	3,9
Climate adaptation (climate risk)	2,5	3,9
Resource inflows (Scarcity of critical materials, environmental footprint of components)	3,0	3,9
Resource outflows (including recyclability, reuse, waste)	3,0	3,9
Own workforce, working conditions (health and safety, adequate wages)	3,6	4,0
Own workforce, equal treatment and opportunities for all (training and skills development)	3,8	4,0
Workers in the value chain, working conditions (adequate wages)	3,4	2,9
Workers in the value chain, working conditions (collective bargaining, freedom of association)	3,4	2,9
Workers in the value chain, other work-related rights (human rights abuse such as e.g. forced labour)	3,0	2,4
Corruption and bribery, corporate culture	3,3	4,0

Scale: 1 – No experience 2 – Limited experience 3 – Familiar with 4 – Practiced experience

2.5. How Kitron has addressed impacts, risks and opportunities during the reporting period GOV-2

Considerations regarding material IROs are an inherent part of strategic reviews and decision making. In 2024, the CMT considered all material IROs in connection with the double materiality analysis (for a full list of material IROs, see Table 2 8 below). For example, investment decisions regarding production facilities take into account GHG emissions reductions and physical climate risk at a regular basis, and risk management regarding 3TG (conflict minerals) is integrated into Kitron's regular practices for managing supply chain risk. The CMT oversees the risk management process formally once a year but assesses and manages risks all year in the weekly CMT meetings. So far, no material trade-offs among material IROs have been identified. Details regarding our risk management procedures are described in more detail in chapter 2.8 below.

2.6. Integration of sustainability-related performance in incentive schemes GOV-3

Kitron's incentive schemes are annually updated and reviewed by The HR and Remuneration Committee and approved by the Board. In accordance with the Remuneration Guidelines, the Senior Executives had an annual variable pay scheme with a maximum potential of 85% percent of the base salary. The scheme has stepped targets representing 0-100% of bonus achievement for EBIT, ROOC R3, Growth and ESG separately. The bonus payments are then calculated based on the actual performance on these targets. The Corporate management Short Term Incentive (STI) has 10 % connected to sustainability which is linked to the share of renewable energy in the total energy consumption of Kitron's facilities. The KPI is % share of renewable energy of total energy scope 2 consumption at the sites. This target has been identified as a key GHG reduction measure, primarily addressing scope 2 emissions, as well as Scope 3 emissions related to leased facilities. The Board does not have performance-related remuneration, and there are no additional incentives directly tied to other climate-related considerations.

2.7. Disclosure of mapping of information provided in the sustainability statement about due diligence process GOV-4

Table 2 5: Statement of due diligence process.

Core elements of due diligence	Paragraphs in the sustainability statement (disclosures in line with the following disclosure requirements)
a) Embedding due diligence in governance, strategy and business model	ESRS2 GOV-1, ESRS2 GOV-2, ESRS2 GOV-5, ESRS2 SBM-1
b) Engaging with affected stakeholders in all key steps of the due diligence	ESRS2 SBM-2, ESRS SBM-2 S1, ESRS SBM-2
c) Identifying and assessing adverse impacts	ESRS2 SBM-3, GOV-1
d) Taking actions to address those adverse impacts	ESRS2 E1-3
e) Tracking the effectiveness of these efforts and communicating	ESRS2 GOV-1, ESRS2 GOV-2

2.8. Risk management and internal controls over sustainability reporting GOV-5

The sustainability reporting process, as well as the steps of the due diligence process described above, is overseen by the group CFO. Therefore, the output of relevant processes such as the stakeholder dialogue, annual risk review and data gathering to track performance, e.g. regarding energy use and GHG emissions are monitored throughout the year on a regular basis. Risk assessments regarding the availability of information and data for the sustainability reporting process are conducted annually by the CFO in cooperation with the group's quality and sustainability function and HR function. Risks are prioritized on a qualitative basis in discussions, mitigating actions are initiated and reviewed by the CMT if needed. During the FY24 reporting cycle, the main risks identified are connected to the availability of granular data regarding Kitron's upstream and downstream value chain, i.e. supplier data on scope 3 emissions and potential sustainability related impacts and risks arising from activities further upstream in Kitron's value chain without a direct business relationship with Kitron. Furthermore, Kitron has identified the risk for resource in- and outflow data being inaccurate due to estimation uncertainty. These findings have been discussed with the CMT throughout FY24. In FY25, risk management and internal controls regarding sustainability reporting will be further streamlined and integrated in Kitron's financial reporting processes. The amendment of the Audit committee's mandate to include sustainability reporting, approved by the Board at the meeting 12 February 2025, is an important step in this regard.

2.9. Key elements of our business SBM-1

Kitron is an Electronics Manufacturing Services (EMS) company. Kitron provides various services within the manufacturing, assembling, and testing of electronic products for the professional market. Core areas are electronics, testing, assembly and system testing, system integration, repairs and upgrades. The company's total revenue for 2024 is 647.2 MEUR, and at the end of the period Kitron had 2564 employees (see also Table 2 6 below).

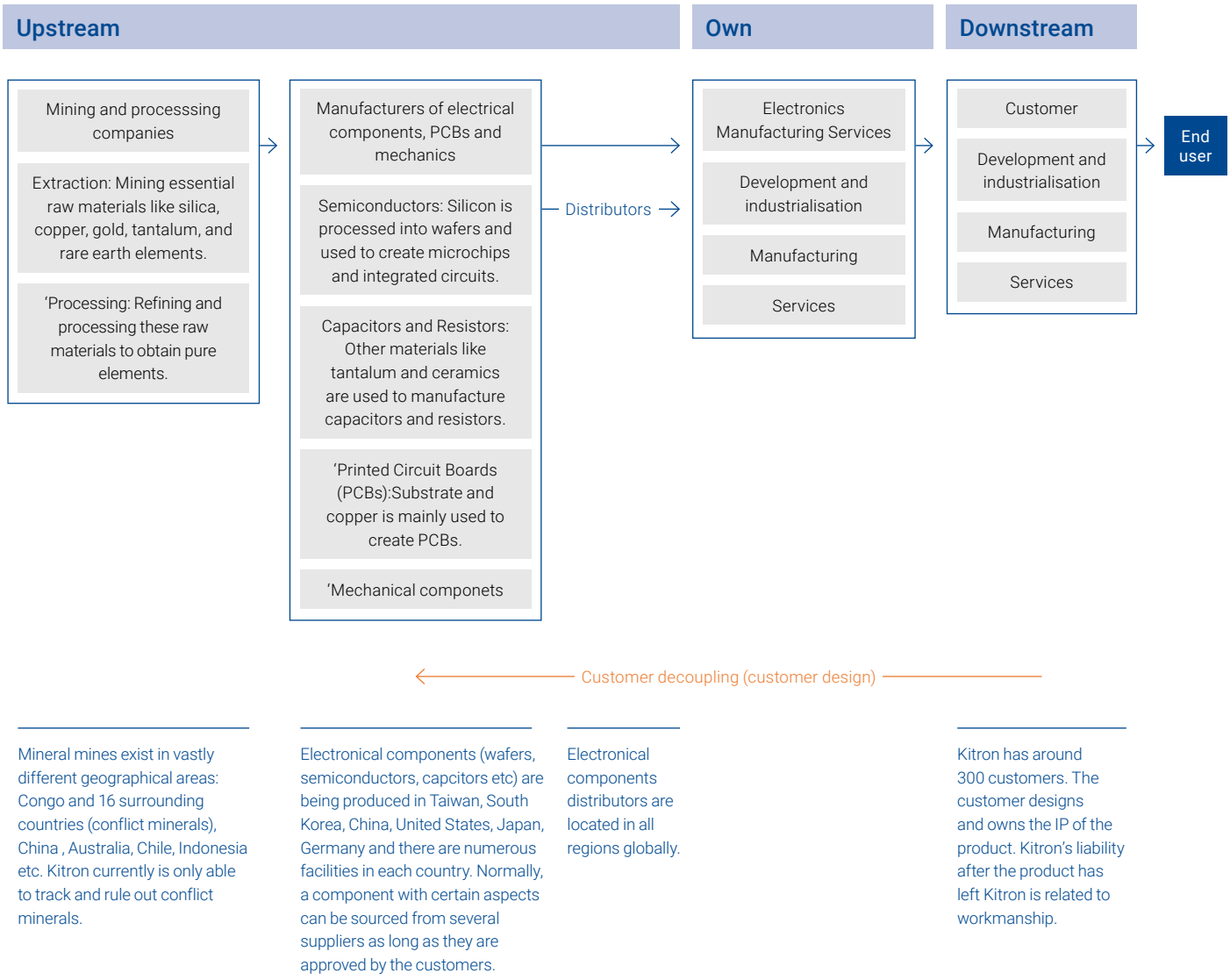
Kitron sorts the customers into five market sectors, Connectivity, Electrification, Industry, Medical devices and Defence & Aerospace. The customers are international, predominantly Northern European, and also include China, and North America. In regard to products and services banned in certain markets, Kitron complies with international trade and export control laws within the jurisdictions in which we operate.

Table 2 6: Total number of employees (head count) by geographical area

Geographical area	Headcount (end of period)
Nordics	1011
Central & Eastern Europe	980
North America	81
Asia	492
Total	**2564**

2.10. Overview of our value chain

Kitron sources components, Printed Circuit Boards (PCBs), mechanical drawing parts and other production inputs from Manufacturers of electrical components, PCBs and mechanics. Kitron's business is to produce the electronics modules and complete systems for the customer which owns the IP (intellectual property) of the products. The products are transported to the customers who distribute them to the end users. Since we manufacture a variety of products within various segments, there are many different types of end-users, ranging from medical or military personnel, operators of industry machinery and equipment, to consumers using household equipment and cars.



Our main promise to any customer is that we want to be their long term, sustainable partner. While the products and services we deliver are required to meet the highest quality requirements, we are fully committed to sustainable development; and we expect the same from our supply partners. Kitron's goal is to minimize negative environmental and social impacts from its supply chain. In Kitron we use the highest standards in selection of supply partners. Inputs are gathered by purchasing components (see above) from our suppliers, and thorough requirements our suppliers must meet, and regular quality checks, our inputs are developed and secured.

We expect our suppliers to adhere to all applicable laws and regulations, to the highest ethical standards defined in the Kitron Code of Conduct, as well as to the separate Suppliers Code of Conduct, which applies to all suppliers. Delivering high quality products is key to Kitron's competitive advantage and of high importance to our customers, employees and owners. Kitron affects quality directly through our purchasing, supplier selection, and quality management processes, as well as indirectly through our business relationships.

Kitron production inputs can be divided into three parts: electronic components, mechanical drawing parts and PCB (Printed Circuit Boards).

Electronic components:
In regard to electronic components, Kitron primarily deals with distributors and manufacturers. Kitron purchases components from close to 1407 manufacturers through approximately 1255 supply partners. Kitron has established a Preferred Partner Program. In 2024, 52 per cent of all electronic components (in value) were procured from 9 Preferred Partners.

Mechanical drawing parts:
This sub commodity includes a wide variety of parts, from metal casting to machine parts, injection molded plastic, sheet metal and aluminum die casting. Due to the bulk and weight of this type of parts, Kitron tends to purchase these components close to the point of use and we continue to build mechanical parts supply chains around our factories in different regions. In 2024, 15 per cent of all Mechanical drawing parts (in value) were procured from 5 Preferred Partners.

Printed Circuit Boards (PCBs):
Kitron buys most of the PCBs from China (up to 70 per cent of the world's PCBs are produced in China), either directly from manufacturers or through distributors, as with electronic components. In 2024, 52 per cent of the PCBs were procured from 4 Preferred Partners. In the case of PCBs, these Preferred Partners include both distributors and manufacturers.

The outputs of our production are complex and high-reliability products for high-value sectors such as electronic components and devices for use within e.g. communications, sensors, batteries, transmission, power management and supplies, robotics, medical diagnostics, life support and surgery. Delivering high quality production services provides benefits to our customers and is key for being our customer's partner of choice, now and in the future, providing benefits for our investors and shareholders.

Regarding the revenue of Kitron's business segments, Kitron reports into one business segment. The Corporate management (Chief Operating Decision Maker) has evaluated that the group operates in only one segment; Electronics Manufacturing Services (EMS). There is therefore no separate segment reporting in Kitron. However revenue is presented in five business sectors, Connectivity, Electrification, Industry, Medical Devices and Defence and Aerospace.

2.11. Elements of our strategy that relate to or impact sustainability matters

Kitron has operations in industries and countries that are particularly susceptible to the risk of corruption. Kitron also does business in countries known for having problems associated with human rights and child labour (China, Malaysia). One of Kitron's most important group of products, PCBAs contain metals such as gold and tin, with the risk of being mined in an area of armed conflict and traded illicitly. We are aware that this presents challenges regarding our sustainability, and that it can subject us to substantial financial risk. Metals such as gold and tin (potential conflict minerals) are part of the prefabricates we purchase, and hence sourced further upstream in Kitron's value chain. Kitron continuously monitor the share of conflict free minerals, but to date Kitron does not have information on geographic locations of other mining activities.

To deal with our sustainability and minimize our financial risk, we work systematically on Ethics and Anti-corruption. We carry out an annual ethics and corruption awareness training and our long term (2030) target is zero incidents of corruption. This sustainability matter linked to PCBAs is relevant for all markets and geographies we operate in (Connectivity, Electrification, Industry, Medical devices and Defence & Aerospace).

Another important aspect for Kitron's business relationships with customers, also posing financial risk to our company, are GHG emission from production processes, relevant across all geographies where Kitron operates and all customer categories. Progress in reducing GHG emissions is important for our customers with ambitious decarbonization agendas across all markets Kitron operates in. For this reason, Kitron has taken action to mitigate emissions (please see chapter E1-3 on climate related actions). The company maintains sufficient internal resources to support ongoing initiatives and does not foresee constraints related to access to finance or capital for the planned actions.

An important aspect of Kitron's strategic approach is to maintain flexibility regarding geographical presence and types of products we can produce for our customers. This is a way of actively managing risks that also relate to sustainability matters, e.g. physical climate risk (in case facilities should be damaged by extreme weather events), or resilience regarding the loss of revenue due to changes in the demand of certain types of products (e.g. applications used by the oil and gas sector facing transition risk).

The oil & gas sector is a subsector of Kitron's industry market sector, and Kitron delivers electronics for subsea oil extraction. The revenue share is around 1.5%. Kitron is not active in the fossil fuel (coal, oil and gas) sector, i.e. Kitron does not derive revenues from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels. No revenue stream comes directly from coal or oil and gas.

2.12. Key stakeholders and how their views and interests are taken into account SBM-2

The views of the stakeholders are taken into account in relevant processes such as strategic discussions and actions and decision making. Members of the CMT are represented in the stakeholder dialogue and CMT is informed about important findings, including sustainability related impacts, the Board is also informed, as part of the regular dialogue at CMT and Board meetings. The findings are discussed at CMT and Board meetings and, if necessary, decisions are made to take appropriate steps to mitigate impacts and risks or pursue opportunities. This way, Kitron ensures an understanding of how our strategic choices and business model may contribute to create, exacerbate or mitigate significant material impacts on key stakeholders, and makes it possible for us to adapt our strategic approach and business model if necessary. Transitioning to the use of green energy, and adequate supplier risk management schemes, are examples of how we have adapted our business practices to the interests and views of stakeholders in the past. For the time being, no further changes are planned or considered to be necessary.

For the purpose of the double materiality analyses, we considered our business activities across the entire value chain up against sustainability matters to identify relevant stakeholders. Subsequently, we used our insights from our ongoing stakeholder dialogue described above, amended with publicly available information and external expert opinions to make sure that the views and interests of the stakeholders are sufficiently covered in our DMA. Details on stakeholder engagement are given in Table 2 7.

Table 2 7: Key stakeholders and their importance to Kitron

Stakeholders	Importance to Kitron	
	Purpose	Details on stakeholder engagement
Investors and banks	The purpose of the stakeholder engagement with investors and banks is to inform about strategies and operations and align them with the stakeholder.	Access to capital is necessary, and it is important that our investors and financers regards Kitron as a safe investment with financial solidity and profitability that will lead to stable shareholder returns. Kitron engages with main investors and banks 3-4 times a year. Engagement with banks are handled by the CFO and the Group Financial manager.
Customers	Fulfill contractual details and follow-up, planning of future cooperation.	The customers require from Kitron that we manufacture their products at a competitive price and that way we support their ambitions for quality and sustainability. Kitron engages with customers, some as often as every week, but formal meetings more normally on a quarterly basis. Customer engagement is handled by COO, BDMs and local KAMs.
Consumers and end-users		Kitron does not engage with consumers and end-users directly since we manufacture products on demand and as a service for our customers, who distribute them to consumers and end-users.
Suppliers	Fulfill contractual details and follow-up, planning of future cooperation.	Good cooperation with our suppliers is essential for us to achieve competitive pricing and timely availability of production inputs. We have high demands on our suppliers and that they comply with the UN Global Compact's 10 principles for human and labor rights, the precautionary principle for the environment and anti-corruption. All suppliers are required to sign our Supplier Code of conduct that they undertake to comply with the requirements. Supplier engagement is handled by the COO, Group Sourcing director, group and local sourcing organisations.
Workers in the value chain		Workers within the value chain are a key group of stakeholders in regard to responsible business practices. At present, Kitron has not engaged directly with these workers, but addresses human and labor rights through engagement with our suppliers (see above and disclosures regarding S2, ESRS 2 SBM-2)

Stakeholders	Importance to Kitron	
	Purpose	Details on stakeholder engagement
Employees	Ensure that that the interests, views, and rights of employees, including respect for their human rights, and including the views of the worker's representatives, are known to Kitron and can be used to inform strategic discussions, actions and decision making-	To achieve our ambitions, we depend on attracting, retaining and developing motivated, engaged and skilled employees. To be an attractive employer we need to create an environment that continuously develops our employees and their competencies. Kitron engages formally once a year in our employee survey. Dependent on local law and labor organizations, meetings with these organizations are conducted more frequently. Employee engagement is very much formalized in the Nordics. Outside of the Nordics it could be topics centered.
Society and affected communities		The society set ramifications that we operate under, through regulations, laws and directives. Kitron is not regarded as a cornerstone company where we operate, and based on the present in-house information on our own operations and value chain no significant IROs regarding affected communities have been identified. Kitron does not have regular engagement with society or affected communities.
Nature		Nature is a "silent stakeholder" that cannot directly represent its interests. We are still completely dependent on nature for us to be able to live good lives. That's why nature is an important stakeholder that is taken into account in Kitron's double materiality assessment, environmental management systems at our sites, and actions such as reducing climate emissions.

As described above, our understanding of the interests and views of our stakeholders is key in informing our strategic discussions, actions and decision making, and they are used continuously to shape our business model to stay future proof.

2.13. Material impacts, risks and opportunities and their interaction with strategy and business model SBM-3

Table 2 8 provides an overview of Kitron's material impacts, risks and opportunities identified in our double materiality assessment. Kitron considers its business model to be resilient in regard to the IROs identified. Risk management practices have proven to be effective and are described further below. Based on our resilience analysis in connection with climate risk (please refer to disclosures in line with E1 below) we consider the measures taken to reduce risks to be adequate. The same applies to the other risks identified and we regard our policies and practices for managing them as sufficient. The (potential) effects of our material IROs and how they are managed is described in detail in the chapters on environmental, social and governance topics.

Table 2 8: Overview of Kitron's material impacts, risks and opportunities

Topical standard ESRS	Impact, risk, and opportunity (IRO)	Type of IRO	+/-	A/P	TF	Where in value chain
ESRS E1 Climate change	Impact on the environment through GHG emissions in scope 1,2 and 3.	I	-	A		Own operations, upstream, downstream
	Risk of losing customers due to evolving market expectations and customer requirements.	R			Medium	Downstream
	Opportunity to acquire new customers by demonstrating a commitment to sustainable operations and aligning with market expectations.	O			Medium	Downstream
	Use of electricity in production impact the environment through GHG emissions in scope 1 and 2.	I	-	A		Own operations
	Extreme weather events, may cause short-term supply chain disruptions, particularly in sourcing critical components.	R			Long	Upstream
	Kitron sites could potentially be affected by flood, forest fires or similar weather events.	R			Short	Own operations
ESRS E5 Circular economy	Substantial resource outflows (products sold to our clients)	I	-	P	Medium	Downstream
	Substantial resource outflows (waste)	I	-	P	Medium	Own operations
	Input materials in products and production processes can have adverse impacts on other sustainability topics.	I	-	P	Medium	Upstream
	Poor handling of waste can lead to fines and loss of reputation.	R			Medium	Own operations
	Scarcity in minerals and other input materials.	R			Medium	Upstream
ESRS S1 Own workforce	Kitron working conditions could potentially harm the employees in the work place.	I	-	P	Short	Own operations
	Kitron's workforce may face challenges related to fair wages and working conditions.	I	-	P	Short	Own operations
	Failure to offer adequate wages that reflect market standards and employee expectations, leading to challenges in maintaining critical competence.	R			Medium	Own operations
	Employee unrest if remuneration levels, worker's rights, health and safety, work life balance are unsatisfactory, or if discrimination occurs.	R			Short	Own operations
	Failure to prioritize employee engagement, training, and skills development, may lead to risk of losing critical talent and competence.	R			Medium	Own operations
ESRS S2 Workers in the value chain	Risk of sourcing materials from conflict-affected or high-risk areas, where mining and production may contribute to human rights abuses or unethical practices.	I	-	P	Medium	Upstream
	Value chain employees may face challenges related to fair wages and working conditions, particularly in regions with weaker labor standards or enforcement.	I	-	P	Short	Upstream
	Value chain workers could be prohibited to organize.	I	-	P	Short	Upstream
ESRS G1 Business conduct	Corruption and bribery in supply chain can contribute to economic inequality and weaken socio-economic development in the regions where Kitron operates.	I	-	P	Short	Upstream
	Potential of being affected by unethical business conduct.	R			Medium	Own operations
	Kitron could potentially be negatively impacted by corruption within own workforce.	R			Medium	Own operations

TF = Timeframe + = Positive - = Negative A = Actual P = Potential

All IROs identified are covered in the ESRS (no entity-specific IROs). There are no changes to the material impacts, risks and opportunities compared to the previous reporting period since this is the first year of reporting under the CSRD.

2.14. Description of process to identify, assess, prioritize and monitor potential and actual impacts on people and environment, informed by due diligence process

In 2024 the double materiality analysis was carried out by the group finance- and sustainability function in collaboration with internal and external experts. The group CFO was responsible for overseeing the process.

We carried out our double materiality assessment in four steps:

1. Understand

In this step we conducted an analysis of Kitron's value chain including our own operations as a starting point for understanding the impacts risks and opportunities (IROs) that may arise from our business model and operations. Furthermore, relevant stakeholders were identified (see above for details on stakeholder engagement).

2. Identify

Inhouse information such as GHG emissions and statistics regarding work related accidents were used to identify and assess impacts, as well as insights from relevant stakeholder engagement processes, e.g. regarding employees (see above). In order to cover impacts, risks and opportunities in Kitron's upstream and downstream value chain, assumptions were made based on general information about sustainability matters as well as the competences of those involved, i.e. Kitron's in-house and external sustainability experts. Furthermore, information from the annual risk review was an important source of information (see chapter on Kitron's overall risk management process below). Further details on the input parameters used (for example, data sources, the scope of operations covered and the detail used in assumptions) can be found below in the chapter on processes to identify and assess material IROs (IRO 1 in connection with E1, E2, E3, E4, E5, G1), as well as the above description of our engagement with stakeholders.

Impacts were considered based on an aggregated overview over Kitron's entire value chain (see chapter 2.10). The complete list of topics in ESRS 1 AR16 was then used as a basis to identify potentially material impacts, risks and opportunities, including where in the value chain they are most relevant. For each impact identified, the risks and opportunities that may arise from it were considered and added to the list of identified risks and opportunities. When identifying impacts, risks and opportunities we also considered dependencies which may result in risks and opportunities for our business. In addition, potential additional topics were considered but none was identified.

Kitron's manufacturing inputs, such as components and PCBs, are produced using minerals like gold, tin etc. (also known as conflict minerals). Therefore, the upstream process has focused on activities and impacts mainly related to mining activities which is identified as a risk on nature and the rights of people. The risks related to business ethics are evaluated as higher in certain areas in Asia (China, Malaysia), but cannot be ruled out in any country.

The general input to the process from stakeholders regarding impacts has been made for earlier materiality analysis and was conducted through interviews. Stakeholder opinions are still considered valid for this year's analysis because, to the best of our knowledge, circumstances have not changed significantly.

The result of this step was a comprehensive list of the actual and potential impacts, risks and opportunities which may be material to Kitron, along with considerations of the timeframes and where in our value chain the IROs are or may be most prominent.

3. Evaluate

In this step the IROs were evaluated based on five step scales for scale, scope, irremediability, likelihood and magnitude of the financial effects as follows:

Impacts were evaluated based the scale (how grave or how positive/beneficial the impact is), the scope (how widespread the impact is), and in case of negative impacts, the irremediability of the impact. For actual impacts, materiality is based on scale and scope, while for potential impacts it is based on scale, scope and likelihood. In the case of a potential negative human rights impact, the severity of the impact (i.e., scale x scope) takes precedence over its likelihood.

Each impact was scored according to five step scales for scale, scope, and irremediability (if relevant).

Each positive impact received a total score based on the average of scale and scope * likelihood (Example: Average of (scale 3+ scope 4) * likelihood 4 = 3.5*4= 14. The total score for the positive impact in this example is therefore 14.)

Each negative impact received a score based on the average of, scale, scope and irremediable character (Example: average of (scale 3+ scope 3 + irremediable character 5) * likelihood 5 = 18.3).

Risks and opportunities were assessed by assessing both the likelihood and the magnitude of the financial effect on a five- step scale. Each risk and opportunity received a score by calculating the product (likelihood x magnitude).

4. Decide
The final step of the DMA process was to decide on which IROs are material to Kitron based on thresholds. The threshold used to define impact and financial materiality can be found in the appendix (9.2, 9.3).

The material IROs were then matched according to the mapping of sustainability matters to topical disclosures published by EFRAG (Q&A ID 177) to determine the information to be disclosed in relation to impacts, risks and opportunities. The relevant metrics have been determined on the basis of the effects of the IROs as described in the following chapters with environmental, social and governance-related information. All metrics associated with material IROs are reported on.

2.15. Details on processes to identify and assess material IROs

IRO-3, in connection with E1, E2, E3, E4, E5, G1

2.15.1. E1 Climate change

Climate-related impacts

As part of the DMA process, Kitron assessed its Scope 1, 2 and 3 greenhouse gas (GHG) emissions, considering both actual and potential impacts, their scale and scope, time horizons in which they may occur, likelihood, and whether they are irremediable. The assessment confirmed that Kitron's emissions have a material impact on climate change, requiring targeted mitigation efforts.

To systematically identify and assess its climate-related impacts, Kitron has conducted a screening of its activities and sites to map actual and potential GHG emissions sources. The screening process involves data collection from individual production sites, where each site reports on its energy consumption, machinery, and operational characteristics. Where primary data is not available, spend-based estimates are applied. Kitron's emission sources remain consistent across sites due to standardized production processes. While absolute emissions may increase with company growth, the sources and nature of emissions remain consistent. The primary driver of increased emissions is the expansion of production capacity rather than changes in emission intensity per site.

One of the key impacts identified is Kitron's overall CO2 emissions from its operations and value chain (Scope 1, 2, and 3). These emissions contribute directly to climate change and are influenced by factors such as energy use, transportation, and supplier emissions. Without effective measures to reduce its carbon footprint, Kitron could face regulatory challenges, increased costs, and reputational risks as customers seek suppliers that align with their sustainability goals. The assessment concluded that this is an actual impact with long-term consequences, requiring continuous monitoring and mitigation efforts, including emission reduction initiatives and carbon offset strategies.

Another material impact relates specifically to Kitron's electricity consumption in production. The company's manufacturing processes rely on energy-intensive machinery, making electricity sourcing a critical factor in its environmental footprint. The assessment found that these emissions are significant but can be mitigated through improved energy efficiency and a transition to renewable energy sources. Given the increasing focus on corporate carbon footprints and energy-related emissions, Kitron recognizes the importance of addressing this impact to ensure long-term sustainability and compliance with evolving regulations.

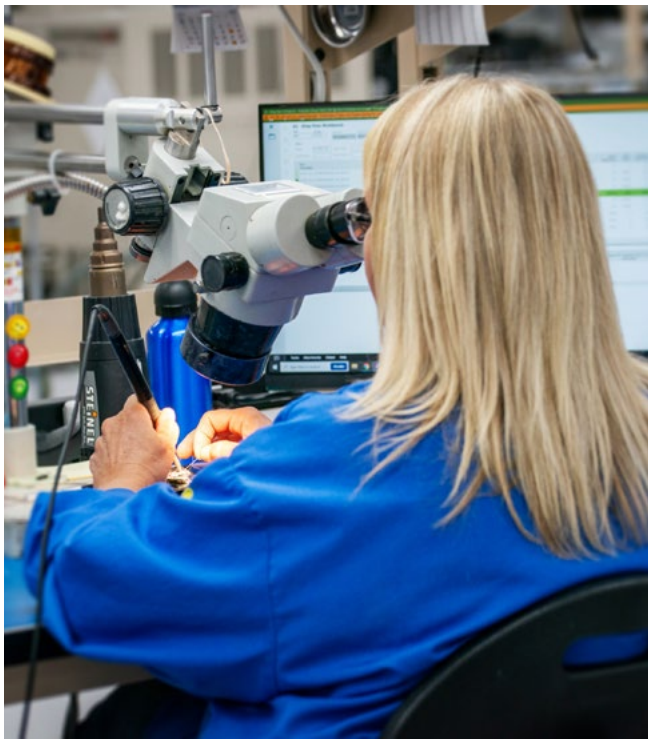
Kitron is directly involved in these emissions through its own operations (Scope 1 and 2) and indirectly through business relationships in its value chain (Scope 3). This includes emissions from suppliers, logistics partners, and product end-of-life handling.

Climate-related physical risks

As part of the double materiality analysis, Kitron identified and evaluated climate-related physical risks across its operations and value chain. These risks were assessed under the same two climate scenarios described in the resilience analysis of its business model: NGFS Net Zero 2050 and NGFS Hot House World – Current Policies.

Identified acute physical hazards include wildfires, storms, flooding, and heatwaves, while chronic risks such as increased precipitation patterns were identified as key long-term concerns. These chronic risks could exacerbate acute hazards and potentially lead to operational disruptions. They may also cause short-term supply chain disruptions. Given Kitron's global presence, different sites may be exposed to varying degrees of physical risk, depending on geographic location and infrastructure resilience.

To assess exposure and sensitivity to these hazards, Kitron conducts structured mapping processes in collaboration with site managers. Each site is asked to provide information on local climate risks, existing protective measures, and historical exposure to extreme weather events. Key findings from this assessment include:



- Water-related risks: Asian facilities are particularly exposed to water-related hazards, such as flooding and heavy rainfall.
- Snow and winter storms: Sites in Norway, Sweden, and the U.S. face potential disruptions from heavy snowfall and extreme winter weather.
- Wildfires: Identified as a potential risk for sites in the U.S. and, to a lesser extent, Norway.

When assessing these risks, Kitron defined time horizons as follows:

- Short-term: Within the reporting year
- Mid-term: Up to five years
- Long-term: Beyond five years

These time horizons are linked to Kitron's strategic long term planning horizons as well as our active risk management procedures described above (short- and medium term) enabling us to assess risk and opportunities according to the expected lifetime of Kitron's key assets and the nature of our operations and address them in connection with investment and operational decision-making.

Each identified risk was evaluated based on financial impact, magnitude, and likelihood, considering how Kitron's assets and operations may be exposed to and sensitive to these hazards. Under the Hot House World scenario, where global temperatures could rise by 3°C due to insufficient climate policies, Kitron's exposure to extreme weather events is expected to be significantly higher. In contrast, the Net Zero 2050 scenario, which limits warming to 1.5°C, suggests a lower degree of physical risk but a more aggressive regulatory and market-driven transition, leading to transition risk.

Climate-related transition risks and opportunities

In addition to physical risks, Kitron identified and assessed key transition risks and opportunities resulting from the shift to a low-carbon economy. These risks were evaluated over short-, medium-, and long-term horizons and assessed under the same two climate scenarios.

Transition events were identified through a structured screening process, which included evaluating regulatory changes, market shifts, technological developments and reputational factors. Kitron screened its assets and business activities to determine their exposure to these transition events, ensuring that both risks and opportunities were considered at different stages of the low-carbon transition.

The primary transition risk identified is changing customer expectations for sustainable operations. There is a risk of losing customers if Kitron does not meet evolving market expectations and customer requirements related to sustainable business practices. As sustainability becomes an increasingly important priority across industries, failure to align with these expectations could impact Kitron's competitiveness and customer relationships. However, this shift also presents an opportunity: by proactively integrating sustainable practices and reducing emissions, Kitron can strengthen its competitive position and attract environmentally conscious clients. Both the risk and the opportunity will be more prominent in the Net Zero scenario, and less significant in a "Hot House" world.

Kitron has not identified any assets or business activities that are incompatible with, or require significant efforts to align with, a transition to a climate-neutral economy.

Each identified transition risk and opportunity was evaluated based on financial impact, magnitude, and likelihood, ensuring a comprehensive understanding of Kitron's exposure. By integrating scenario analysis into its strategic planning, Kitron aims to proactively manage both physical and transition risks, ensuring long-term resilience and regulatory alignment.

2.15.2. E2 Pollution

Kitron has not screened site locations in order to identify actual and potential pollution – related IROs, and we have not conducted consultations with stakeholders. Business activities across our entire value chain were screened by discussing the topic with Kitron's in-house sustainability experts. Based on these insights we have made the assumption that there are no significant IROs for Kitron connected to this sustainability topic.

2.15.3. E3 Water and marine resources

Kitron has not screened site locations in order to identify actual and potential IROs related to water and marine resources, and we have not conducted consultations with stakeholders. Business activities across our entire value chain were screened by discussing the topic with Kitron's in-house sustainability experts.

2.15.4. E4 Biodiversity and ecosystems

Kitron has screened and assessed actual and potential impacts on biodiversity and ecosystems at own site locations and in the upstream and downstream value chain by discussing business activities across our entire value chain in relation to relevant sustainability topics (ESRS 1 AR 16) with Kitron's in-house sustainability experts. No significant actual or potential impacts or dependencies on biodiversity and ecosystems and their services at own site locations and in the upstream and downstream value chain, and no entity specific IROs, have been identified.

We have not identified and assessed transition and physical risks and opportunities related to biodiversity and ecosystems or considered systemic risks.

Consultations with affected communities on sustainability assessments of shared biological resources and ecosystems have not been conducted.

Based on current in-house information no sites, raw material production or sourcing is likely to significantly negatively impact biodiversity and ecosystems, affected communities or ecosystem services of relevance to affected communities.

Kitron has no sites located in or near biodiversity-sensitive areas that could be negatively affected through our activities, hence it has not been concluded that it is necessary to implement biodiversity mitigation measures.

Based on this we have made the assumption that there are no significant IROs for Kitron connected to this sustainability topic.

2.15.5. E5 Circular economy

As part of the double materiality analysis (DMA) process, Kitron has screened its activities in the entire value chain regarding its resource inflow and outflow streams including waste and resource use, by consulting with inhouse competences and external experts. Kitron has not screened its assets in connection with circular economy related IROs. Kitron has not conducted consultations with affected communities as a part of the DMA process.

2.15.6. G1 Governance

When identifying material impacts, risks and opportunities related to business conduct Kitron has conducted a high-level risk assessment by examining its sites and leveraging publicly available information, sector knowledge, supplier due diligence data and general industry insights.

When identifying material impacts, risks, and opportunities in relation to business conduct matters, as per ESRS-2, we have considered relevant criteria, including location, activity, sector, and the structure of transactions. We have reviewed all of our locations, using publicly available information such as the Corruption Perception Index to assess high-risk areas. Additionally, we have evaluated our business activities that are primarily related to procurement. Our production inputs, mechanical drawing parts, electronic components and Printed Circuit Boards (PCBs) have been considered for sector-specific risks relevant to procurement of such components. The structure of our transactions is regular and primarily involves procurement from suppliers, whom we expect to adhere to our supplier code of conduct. Additionally, we have a supplier due diligence procedure that provides information on risks associated with our suppliers which has been taken into consideration.

2.16. Description of how the process to identify, assess and manage sustainability related IROs is integrated into Kitron's overall risk management process

Kitron carries out an annual risk assessment throughout the group. The group CFO is responsible for overseeing the process. Each operating Kitron entity performs a risk assessment according to the Kitron Risk Management Policy and the Annual Risk Assessment Guidelines. The risk assessment process builds on the contribution from all disciplines in the organization and it is the Site Managers responsibility to secure a proper risk assessment process in their organizations. The results are reported to Kitron ASA and the consolidated risk assessment is reviewed by CMT and Board. The annual risk assessment also requires all Kitron entities to describe the internal controls that are in place and the actions that are taken to mitigate risks. Risk categories are organized into 11 main categories which also include sustainability aspects, i.e. competence/personnel, compliance including code of conduct and GDPR, suppliers and environment. However, not all of Kitron's material IROs are covered. The priority of the identified risks is determined using financial impact and likelihood criteria on four step scales. The product of the likelihood and impact of each identified risk is calculated both for the inherent and the residual risk and the results are visually presented in risk matrices. Sustainability-related risks are prioritized in the same manner as other types of risks.

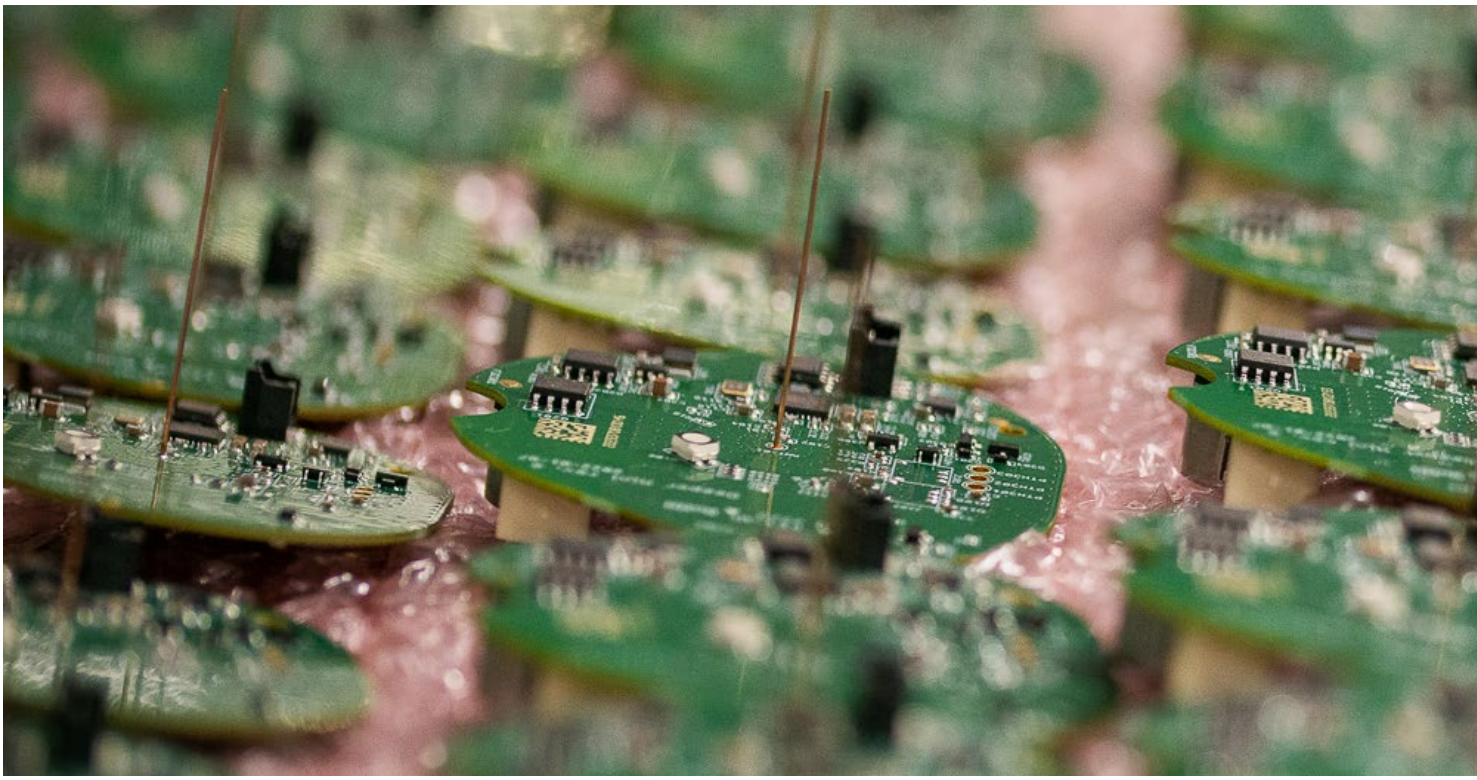
Kitron has not yet integrated the process to identify, assess and manage impacts and risks and opportunities as required by the ESRS into the management risk process but plans to do so before 30.06.2026.

In the current risk assessment process described above, sustainability related risks are assessed and potentially prioritized in the same manner as other types of risks. For the time being, no dedicated internal controls, other than the follow-up on site specific internal controls mentioned above, are applied to sustainability matters.

2.17. Disclosure of list of data points that derive from other EU legislation and information on their location in sustainability statement

See chapter 9.1 List of datapoints in cross-cutting and topical standards that derive from other EU legislation

MDR-P, A, M and T, as well as descriptive information on IROs as required by ESRS 2 par 46, are disclosed in connection with topical ESRS.



3. Disclosures pursuant to the EU Taxonomy

Explanation of changes in preparation and presentation of sustainability information and reasons for them

This is the first year of reporting according to CSRD. Any changes to Sustainability reporting are due to the reporting requirements of CSRD. Kitron's taxonomy reporting was previously based on end-user products, and as of 2024, manufacturing of Electronics category is used. The reason for this change is that this category is a more accurate fit for Kitron's business and thus provides the information required. It is impractical to adjust comparative information. The difference between the information provided based on end-user products and manufacturing of electronics is that fewer groups of products are relevant for reporting in connection with manufacturing of electronics.

Eligibility under EU Taxonomy

Kitron's main activity is an electronics Manufacturing services company with NACE code C26.1: "Manufacture of electronic components and boards" which qualifies as eligible under "Manufacture of electrical and electronic equipment" activity. This activity represents 98.3% of the Revenue.

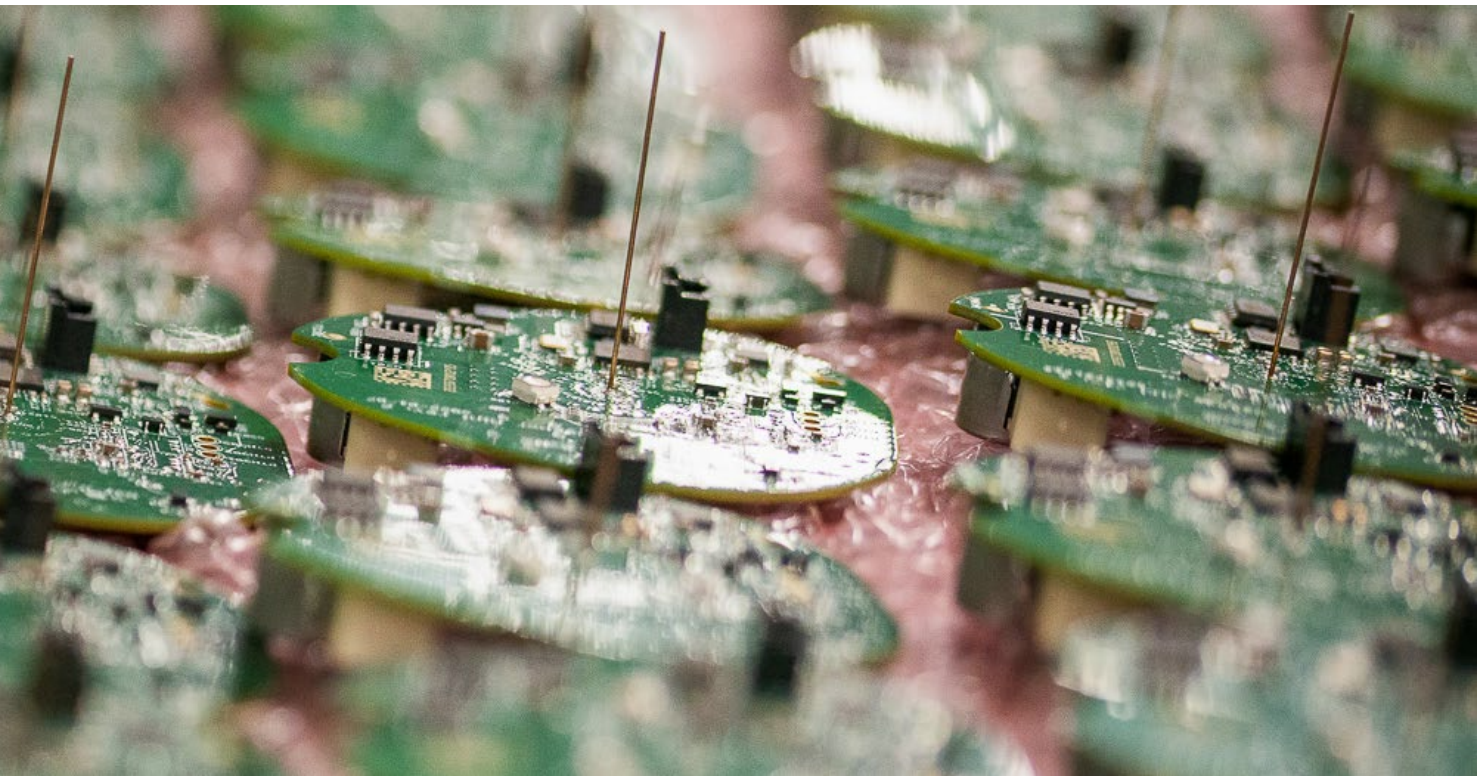
A subset of the main activity "Manufacture of electronic components and boards" is production of non-portable battery storage systems and battery management systems which qualifies as eligible under "Manufacture of batteries" activity. This activity represents 1.4% of Kitron Revenue.

Another subset of the main "Manufacture of electronic components and boards" activity is repair and overhaul of customer product for the defence industry which qualifies as eligible under the "Repair, refurbishment and remanufacturing" activity. This activity represents for 0.4% of the Revenue

In addition, Kitron owns and leases buildings where the manufacturing takes place. This activity qualifies as eligible under the "Acquisition and Ownership of Buildings" activity.

Alignment under EU Taxonomy

When determining alignment under the EU Taxonomy, Kitron first reviewed the technical screening criteria for each of the acivities and found that Kitron does not fully comply with the criteria for any of the activities. Consequently, the criteria for alignment under the EU Taxonomy are not met, and DNSH and minimum safeguards were not considered.
Thus, for all activities, Kitron is eligible but not aligned.



Proportion of turnover from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2024

Financial Year N		Year		Substantial Contribution Criteria						DNSH criteria (Does Not Significantly Harm)									
Economic Activities (1)	Code (2)	Turnover (3)	Proportion of Turnover, year N (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Taxonomy aligned (A.1.) or eligible (A.2.) Turnover, year N-1 (18)	Category enabling activity (19)	Category transitional activity (20)
Kitron	C26.1	KEUR	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1 Environmentally sustainable activities (Taxonomy-aligned)																			
Activity 1		0								Y	Y	Y	Y	Y	Y	Y	%		
Activity 2		0								Y	Y	Y	Y	Y	Y	Y	%		
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		**0**	0.00 %	%	%	%	%	%	%	Y	Y	Y	Y	Y	Y	Y	%		
Of which Enabling		0	0.00 %	%	%	%	%	%	%	Y	Y	Y	Y	Y	Y	Y	%	E	
Of which Transitional		0	0.00 %	%						Y	Y	Y	Y	Y	Y	Y	%		T
A.2 Taxonomy Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL										
Manufacture of batteries	CCM 3.4	8 814	1.36 %	EL	N/EL	N/EL	N/EL	N/EL	N/EL								1.37 %		
Manufacture of electrical and electronic equipment	CE 1.2	635 998	98.28 %	N/EL	N/EL	N/EL	N/EL	EL	N/EL								98.39 %		
Repair, refurbishment and remanufacturing	CE 5.1	2 339	0.36 %	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.24 %		
Turnover of Taxonomy eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		647 151	100.00 %	%	%	%	%	%	%								100 %		
A. Turnover of Taxonomy eligible activities (A.1+A.2)		647 151	100.00 %	%	%	%	%	%	%								100 %		
B. TAXONOMY NON-ELIGIBLE ACTIVITIES																			
Turnover of Taxonomy non-eligible activities		0	0.00 %																
TOTAL		**647 151**	**100 %**																

Proportion of CapEx from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2024

Financial Year N		Year		Substantial Contribution Criteria						DNSH criteria (Does Not Significantly Harm)									
Economic Activities (1)	Code (2)	CapEx (3)	Proportion of CapEx, year N (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) CapEx, year N-1 (18)	Category enabling activity (19)	Category transitional activity (20)
Kitron	C26.1	KEUR	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1 Environmentally sustainable activities (Taxonomy-aligned)																			
Activity 1	0	0.0	0.00 %							Y	Y	Y	Y	Y	Y	Y	%		
Activity 2	0	0.0	0.00 %							Y	Y	Y	Y	Y	Y	Y	%		
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		**0**	0.00 %	%	%	%	%	%	%	Y	Y	Y	Y	Y	Y	Y	%		
Of which Enabling		0	0.00 %	%	%	%	%	%	%	Y	Y	Y	Y	Y	Y	Y	%	E	
Of which Transitional		0	0.00 %	%						Y	Y	Y	Y	Y	Y	Y	%		T
A.2 Taxonomy Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL										
Manufacture of batteries	CCM 3.4	209	1.1 %	EL	N/EL	N/EL	N/EL	N/EL	N/EL								1.06 %		
Manufacture of electrical and electronic equipment	CE 1.2	11 810	64.1 %	N/EL	N/EL	N/EL	N/EL	EL	N/EL								77.67 %		
Repair, refurbishment and remanufacturing	CE 5.1	60	0.3 %	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.13 %		
Acquisition and ownership of buildings	CCM 7.7	6 354	34.5 %	EL	EL	N/EL	N/EL	N/EL	N/EL								21.14 %		
CapEx of Taxonomy eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		18 433	100.00 %	%	%	%	%	%	%								100 %		
A. CapEx of Taxonomy eligible activities (A.1+A.2)		18 433	100.00 %	%	%	%	%	%	%								100 %		
B. TAXONOMY NON-ELIGIBLE ACTIVITIES																			
CapEx of Taxonomy non-eligible activities			0.00 %																
TOTAL		**18 433**	**100 %**																

Proportion of OpEx from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2024

Financial Year N		Year		Substantial Contribution Criteria						DNSH criteria (Does Not Significantly Harm)									
Economic Activities (1)	Code (2)	OpEx (3)	Proportion of OpEx, year N (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) OpEx, year N-1 (18)	Category enabling activity (19)	Category transitional activity (20)
Kitron	C26.1	KEUR	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1 Environmentally sustainable activities (Taxonomy-aligned)																			
Activity 1	0		0.00 %							Y	Y	Y	Y	Y	Y	Y	%		
Activity 2	0		0.00 %							Y	Y	Y	Y	Y	Y	Y	%		
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		**0**	0.00 %	%	%	%	%	%	%	Y	Y	Y	Y	Y	Y	Y	%		
Of which Enabling		0	0.00 %	%	%	%	%	%	%	Y	Y	Y	Y	Y	Y	Y	%	E	
Of which Transitional		0	0.00 %	%						Y	Y	Y	Y	Y	Y	Y	%		T
A.2 Taxonomy Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL										
Manufacture of batteries	CCM 3.4	59	1.10 %	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.87 %		
Manufacture of electrical and electronic equipment	CE 1.2	4 206	78.62 %	N/EL	N/EL	N/EL	N/EL	EL	N/EL								78.95 %		
Repair, refurbishment and remanufacturing	CE 5.1	33	0.62 %	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.44 %		
Acquisition and ownership of buildings	CCM 7.7	1 052	19.66 %	EL	EL	N/EL	N/EL	N/EL	N/EL								19.74 %		
OpEx of Taxonomy eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		5 350	100.00 %	%	%	%	%	%	%								100 %		
A. OpEx of Taxonomy eligible activities (A.1+A.2)		5 350	100.00 %	%	%	%	%	%	%								100 %		
B. TAXONOMY NON-ELIGIBLE ACTIVITIES																			
OpEx of Taxonomy non-eligible activities			0.00 %																
TOTAL		**5 350**	**100 %**																

Nuclear and fossil gas related activities

Row	Nuclear energy related activities	
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
	Fossil gas related activities	
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

4. E1 Climate change

4.1. Transition plan for climate change mitigation E1-1

Kitron has not yet developed a transition plan that fully aligns with the requirements of the CSRD. However, we are committed to implementing such a plan no later than June 30, 2026.

4.2. Material IRO's and their interaction with strategy and business model ESRS 2 SBM-3

Based on Kitron's assessment of climate-related risks, we have identified both physical and transition risks that could impact our operations and strategy.

4.2.1. Physical risks:

- Facility vulnerability to extreme weather events: Kitron's production sites are susceptible to various climate related events:
  - Norway, Sweden, and the US: Heavy snowstorms may hinder facility access and impose structural stress due to snow accumulation.
  - Norway: Proximity to forested areas increases the risk of forest fires affecting operations.
  - Asia: Facilities in this region are exposed to storms and typhoons, which can damage infrastructure.
- Short-term supply chain disruptions: Climate-related physical risks, such as extreme weather events, may cause short-term supply chain disruptions, particularly in sourcing critical components. This could delay production and impact Kitron's ability to meet customer demands.

4.2.2. Transition risks:

- Customer expectations for sustainable operations: There is a risk of losing customers if Kitron does not meet evolving market expectations and customer requirements related to sustainable business practices. As sustainability becomes an increasingly important priority across industries, failure to align with these expectations could impact Kitron's competitiveness and customer relationships.

4.3. Resilience of strategy and business model SBM-3

Kitron conducted a resilience analysis in autumn 2024 in parallel with the double materiality analysis, and further amendments and updates were made in February 2025. The purpose of the resilience analysis was to evaluate how climate-related physical and transition risks may impact Kitron's strategy and business model. The analysis focused on Kitron's entire value chain, assessing both physical and transition risks. For physical risks, both acute and chronic risks were considered more in depth for own operations (sites):

- Acute risks: Sites in Norway, Sweden, the USA, and Asia were evaluated for their vulnerability to extreme weather events, such as storms, flooding, snowstorms and heatwaves.
- Chronic risks: Increased precipitation patterns were identified as a key long-term risk, which may intensify acute risks and lead to operational disruptions.

Kitron evaluated the resilience of its production sites based on geographical factors, including proximity to the sea and watercourses, elevation above sea level, proximity to forests, and historical and current exposure to extreme weather events, particularly precipitation such as snow and rain. The geographical data was compiled through site-specific analyses, with findings discussed by the CMT. For transition risks, the assessment considered how regulatory developments, customer expectations, and technological advancements could impact Kitron's business.

The scenario analysis relies on a combination of site-specific data for Kitron's production facilities and broader regional climate projections. While detailed geospatial modeling is not applied to all sites, the use of local environmental data ensures an adequate level of detail to assess potential physical and transition risks.

The resilience analysis was conducted using the same time horizons as for the double materiality analysis:

- Short-term (2025): Focuses on immediate regulatory changes, evolving customer demands, and acute physical risks, particularly extreme weather events that could impact operational continuity.
- Medium-term (2030): Aligns with mid-decade policy milestones and transitional developments under the Net Zero 2050 scenario, including tightening emissions regulations, rising carbon costs, and increasing expectations for sustainable practices. This period also accounts for gradual intensification of chronic physical risks, such as increased precipitation patterns.
- Long-term (2050): In the Net Zero 2050 scenario, this horizon examines the systemic shift towards a low-carbon economy, evaluating the opportunities and challenges of achieving global climate targets. In contrast, the Hot House World – Current Policies scenario explores the implications of limited climate action, leading to exacerbated physical risks and potential disruptions to Kitron's value chain.

Kitron assessed its strategy and business model against two climate scenarios developed by The Network of Central Banks and Supervisors for Greening the Financial System (NGFS): Net Zero 2050 and Hot House World – Current Policies. Since these scenarios represent "worst case" assumptions regarding physical climate risk and transition risk, respectively, and we consider both types of risk as relevant for Kitron, we found these scenarios to be suitable for this purpose.

In the Net Zero 2050 scenario, where global emissions are rapidly reduced in line with the Paris Agreement, regulatory requirements for greenhouse gas emissions will tighten significantly. The transition to a low-carbon economy will lead to stricter reporting obligations, higher carbon prices, and increasing customer expectations for sustainable solutions. This presents a transition risk for Kitron, particularly if the company does not adapt to new regulations and market demands from customers, investors, and authorities. At the same time, this scenario offers opportunities for Kitron to strengthen its market position by providing low-carbon solutions and more energy-efficient products. On the physical risk side, more stable climate conditions and fewer extreme weather events will result in fewer operational disruptions. However, increased precipitation in some regions may still impact production facilities and supply chains, necessitating measures to ensure infrastructure resilience.

In the Hot House World scenario, where current climate policies continue without significant emissions reductions, physical climate risks will become increasingly severe. Kitron may face more frequent and intense extreme weather events such as floods, storms, forest fires and heatwaves, potentially disrupting production sites, supply chains, and logistics. Increased precipitation and shifting weather patterns could also lead to infrastructure challenges and higher operating costs. On the other hand, a less regulated transition could provide short-term financial benefits by allowing existing production processes to continue without major investments.

Kitron's business model is designed to be highly adaptable, allowing the company to respond flexibly to shifting market demands and climate-related challenges. The company has the ability to adjust its customer portfolio and product offerings in alignment with market trends which may vary in different scenarios regarding sustainability ambitions. Additionally, Kitron is not dependent on fixed locations, making it possible to relocate or adapt operations as needed to mitigate risks associated with climate change. In addition, Kitron does not rely on external financing to implement climate adaptation and mitigation measures (as described in chapter 4.5) beyond standard business operations, reducing its exposure to financial risks associated with the transition to a low-carbon economy. This flexibility strengthens Kitron's resilience by enabling proactive responses to both physical and transition risks, ensuring long-term competitiveness in an evolving regulatory and environmental landscape.

Kitron's ability to adapt spans across short-, medium-, and long-term horizons. In the short term, the company focuses on operational flexibility and supply chain adjustments; in the medium term, it evaluates strategic shifts such as product portfolio changes and technology upgrades; and in the long term, Kitron considers potential large-scale transitions, including facility relocations, major process transformations, and workforce reskilling to align with evolving climate and market conditions.

While uncertainties remain regarding future climate developments, Kitron has based its analysis on best available knowledge and scenario projections. The company will continue to monitor climate-related risks and opportunities, ensuring that its strategy remains resilient in the face of changing environmental and regulatory conditions.

4.4. Climate-related policies and targets E1-2 | E1-4

Kitron has not yet established formal policies for climate change mitigation and adaptation. However, the company recognizes the importance of managing climate-related risks and opportunities and is committed to developing relevant policies. Kitron aims to have these policies in place by 30.06.2026 to support its sustainability efforts and long-term business resilience.

Kitron has set aims to reduce location-based GHG emissions in Scope 1 and 2 by 50 % and GHG emissions in Scope 3 by 25 % before 2050. In 2024, the company has made significant updates to its carbon accounting, and for consistency, 2022 will be the base year of the reduction targets in scope 1 and 2, while 2024will be the base year of the reduction targets in scope 3. The targets are not science-based or proved to be compatible with limiting global warming to 1.5C. The target values for 2025, presented in table 4.2, are calculated based on a 10 % reduction in Scope 1 and 2 and a 5 % reduction in Scope 3.

The company has also defined an ambition to achieve 100% renewable energy usage across all its sites and will use this as a key indicator to evaluate progress. The company tracks the effectiveness of its actions related to renewable energy by monitoring energy consumption under Scope 1 and 2 on a quarterly basis. This enables Kitron to assess the impact of its renewable energy initiatives.

4.5. Climate-related actions E1-3

Kitron has identified that energy consumption for production and the heating/cooling of facilities is the largest source of CO2 emissions under Scope 1 and 2. To mitigate these emissions, the company has implemented and planned several non-quantifiable key actions:

- Sourcing renewable energy: Solar panels were installed at sites in Sweden and Lithuania between 2022 and 2024. This, combined with purchasing garantees of origins, have made the Scope 2 market-based renewable energy share increase from 64.4 % in 2022 to 96.2 % in 2024. While not all sites have been equipped due to practical constraints, Kitron aims to reach 100 % scope 2 market-based renewable energy by 2025.
- Energy efficiency in new investments: From 2024 onwards, Kitron has integrated energy efficiency requirements into all new equipment and facility investments. This is an ongoing initiative without a fixed end date, designed to continuously reduce energy consumption and lower Scope 1 and 2 emissions over time.
- Waste reduction initiatives: Waste reduction measures have been implemented across all sites, in line with environmental certification standards, and are reviewed annually. This is a long-term commitment aimed at minimizing landfill waste and improving resource efficiency.

These actions cover all Kitron's sites globally, focusing primarily on own operations (Scope 1 and 2), but also impacting parts of the upstream supply chain through renewable energy sourcing and sustainability requirements for suppliers.

Kitron's current climate-related actions are primarily funded through operational budgets and do not require significant external financing. The company maintains sufficient internal resources to support ongoing initiatives and does not foresee constraints related to access to finance or capital for the planned actions.

4.6. Energy consumption and mix E1-5

Energy consumption and mix are based on site-specific data.

Kitron's energy intensity, calculated as total energy consumption per net revenue for activities in high climate impact sectors (Section C – Manufacturing, see Annex I in Regulation (EC) No 1893/2006), is **0.04 MWh/KEUR**. This is derived from a total energy consumption of **26,313 MWh** and a net revenue of **647,150 KEUR (647.2 MEUR)**, see note 5 and 6 in the final statements.

Table 4 1: Energy consumption and mix.

	2024 (N)
(1) Fuel consumption from coal and coal products	225.8
(2) Fuel consumption from crude oil and petroleum products	750.6
(3) Fuel consumption from natural gas	3 425.2
(4) Fuel consumption from other fossil sources	
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources	394.8
(6) Total fossil energy consumption	4 796.4
Share of fossil sources in total energy consumption (%)	18 %
(7) Consumption from nuclear sources	0.0
Share of consumption from nuclear sources in total energy consumption (%)	
(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.)	0.0
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	21 288.1
(10) The consumption of self-generated non-fuel renewable energy	248.8
(11) Total renewable energy consumption	21 517.4
Share of renewable sources in total energy consumption (%)	82 %
Total energy consumption	**26 313.7**

The estimates on energy consumption and mix have not been validated by an external body other than the assurance provider.

4.7. Gross Scopes 1, 2, 3 and Total GHG emissions E1-6

Kitron applies an operational control approach when defining its carbon accounting boundaries. Scope 1 and 2 emissions are reported for all controlled entities, while Scope 3 emissions are accounted for across relevant upstream and downstream activities, in line with the GHG Protocol. Kitron's carbon accounting considers the following greenhouse gases, all converted into CO2-equivalents: CO2, CH4, N2O, SF6, HFCs, PFCs and NF3. Scope 1 and Scope 2 emissions are primarily calculated using invoice data. For Scope 3 emissions, the spend-based method has been applied, with inputs collected per site. There are no biogenic emissions from the combustion or biodegradation of biomass. Hence not disclosed.

91,72 % of the emissions in scope 3 are calculated based on spend, 5,95 % is calculated based on supplier provided data, and 2,33 % is calculated based on distance 95 % of the electricity consumption across the group's sites is covered by Guarantees of Origin, primarily acquired by the electricity provider. This explains the significant difference between market-based and location-based scope 2 emissions.

Table 4 2: Scope 1, 2, 3, and total GHG emissions. .

	Retrospective					Milestones and target years			
	Base year	Base year value	Compa-rative	2024 (N)	% N / N-1	2025	2030	(2050)	Annual % target / Base year
Scope 1 GHG emissions									
Gross Scope 1 GHG emissions (TCO2eq)	2022	841	926	848.4	-8 %	760	590	422	2 %
Percentage of Scope 1 GHG emissions from regulated emissions trading schemes (%)			N/A	0 %		0	0	0	0 %
Scope 2 GHG emissions									
Gross location-based Scope 2 GHG emissions (tCO2eq)	2022	7 167	7 807	5 963.7	-24 %	6 450	5 017	3 584	-2 %
Gross marked-based Scope 2 GHG emissions (tCO2eq)	2022	3 840	2 259	369.5	-84 %	0	0	0	-33 %
Significant Scope 3 GHG emissions									
Gross Scope 3 GHG emissions (tCO2eq)	2024		N/A	88 624.8		84 194	75 331	66 469	-1 %
Purchased goods and services	2024		N/A	77 827.6		73 936	66 153	58 371	-1 %
Capital goods	2024		N/A	2 314.7		2199	1968	1736	-1 %
Fuel and energy-related activities	2024		N/A	1 626.6		1545	1383	1220	-1 %
Upstream transportation and distribution	2024		N/A	3 507.6		3332	2981	2631	-1 %
Waste generated in operations	2024		N/A	174.3		166	148	131	-1 %
Business travels	2024		N/A	852.1		809	724	639	-1 %
Employee commuting	2024		N/A	2 321.8		2206	1973	1741	-1 %
Total GHG emissions									
Total GHG emissions (location-based) (tCO2eq)			**N/A**	**95 436.9**		**91 404**	**80 938**	**70 473**	**-1 %**
Total GHG emissions (marked-based) (tCO2eq)			**N/A**	**89 842.7**		**84 954**	**75 921**	**66 889**	**-1 %**

Scope 1 and scope 2 location-based targets are calculated as a reduction from base year of 30% until 2030 and 50% until 2050. The market-based target is set to 100% renewable energy, which is planned to be reached in 2025, mainly due to purchasing of guarantees of origins. The Scope 3 target is calculated as a target reduction of 15% until 2030 and 25% until 2050.
The estimates on GHG emissions have not been validated by an external body other than the assurance provider.

4.7.1. Scope 3 categories and methodology

Kitron has reviewed all Scope 3 categories to assess their relevance and materiality. Based on this assessment, the following categories are included in the reporting:

- Purchased goods and services: The spend-based method uses reported material expenses, categorized as follows:
  - Electronic components
  - Metal products
  - Plastic products
  - Cables and Wires
  - Printed circuit boards
  - Chemicals
- Capital goods: Inputs are based on additions to fixed assets.
- Fuel and energy-related activities: The spend-based method uses reported petrol and diesel volumes under Scope 1 and Scope 2.
- Upstream transportation and distribution: Includes costs associated with the transportation of incoming goods. Outgoing transport is included but is limited in scope.
- Waste generated in operations: Based on reports from recycling facilities and other waste management providers.
- Business travel: Inputs are derived from travel expense reports.
- Employee commuting:
  - The average commuting distance per site is estimated by calculating the distance between postal codes and the site.
  - All employees within the same postal code are assigned the same commuting distance.
  - The average commute per employee is determined by summing individual commute distances and dividing by the total number of employees.
  - HR departments provide estimates of transportation modes and their relative distribution based on experience.

The following Scope 3 categories have been assessed as not material or outside Kitron's reporting scope:

- Upstream Leased Assets: Considered under operational control and therefore reported under Scope 2.
- Downstream Transportation and Distribution: Assessed as immaterial and included under "Upstream Transportation and Distribution."
- Processing of Sold Products, Use of Sold Products, and End-of-Life Treatment of Sold Products: These are the responsibility of the product owner and fall outside Kitron's reporting scope.
- Downstream Leased Assets and Franchise Agreements: Kitron does not have any relevant assets in these categories.

For each significant Scope 3 category, the reporting boundary follows the operational control approach and includes all controlled entities within Kitron's consolidated accounting group. All companies within the Kitron Group are 100% owned, and there are no associates, joint ventures, or unconsolidated subsidiaries. As a result, there are no indirect Scope 3 emissions from such entities to report.

Kitron's carbon accounting has been prepared in alignment with the GHG Protocol and utilizes the CEMAsys platform for data collection, emissions calculations, and reporting. Scope 1 and 2 emissions are calculated using actual consumption data and corresponding location-based and market-based emission factors. Scope 3 emissions are calculated using a combination of spend-based methods, distance-based methods, and supplier-specific data. For categories where specific data is limited, industry averages and proxy data are applied following the GHG Protocol guidelines. Emission factors applied within CEMAsys are sourced from recognized international databases, such as DEFRA, IEA, and Ecoinvent, depending on data availability. Localized emission factors are used where relevant, particularly for electricity consumption under Scope 2.
100% of the contractual instruments Kitron uses for the purchase of renewable energy are energy attribute. certificates.

Table 4 3: GHG intensity per net revenue.

GHG intensity per net revenue	Comparative	2024 (N)	% N / N-1
Total GHG emissions (location-based) per net revenue (tCO2eq/Monetary unit)	N/A	147.46	
Total GHG emissions (marked-based) per net revenue (tCO2eq/Monetary unit)	N/A	138.82	

Net revenue used to calculate GHG intensity is the total revenue as stated on page 78 in our income statement and in notes 5,6 and amounts to 647.2 MEUR for 2024.

5. E5 Circular economy

5.1. Impacts, risks, and opportunities related to resource use and circular economy

ESRS 2 SBM-3

Our double materiality analysis confirmed that Kitron's use of resources may have a material negative impact in the medium term (1-5 years). Kitron has potential impacts and risks related to resource use and circular economy, both from its own operations and from its upstream and downstream value chain.

With regards to resource inflows, Kitron use large amounts of raw materials in their products and production processes, and there is an overhanging risk that some materials used for production will become scarce. Sourcing of materials can also have negative impacts on other related sustainability topics, such as climate change, pollution, biodiversity, risks in supply chain, and human rights.

Kitron has substantial resource outflows in our downstream value chain from products sold to our clients (end-of-life). Significant amounts of waste is also generated in our own operations. Hazardous waste and materials that are generated from the production process and products could potentially pollute water and soil, if not sorted correctly and recycled.

5.2. Financial risks and opportunities

Resource inflows and resource use

Scarcity in raw materials, such as rare minerals, is a global issue and may a have an impact on Kitron's access to input materials in the near future. As a result, there is an overhanging risk that Kitron may not be able to acquire sufficient components for its production, due to shortage in supply. Consequently, there will be an increased need for reduced and circular use of critical raw materials. It may also be increasingly important for Kitron's customers that resources are sourced and used in a responsible way, and that they are ROHS- and REACH-compliant. Consequently, there is a risk that Kitron's base of qualified suppliers will shrink. Kitron can impact its resource inflows and resource use through its choice of suppliers and materials, and through sourcing of components, PCBs, and other mechanical parts.

Resource outflows and waste

For Kitron, there are several risks connected with the handling of waste and design of products. Firstly, if waste is not sorted and delivered to recycling according to procedures Kitron might be fined and lose reputation with customers. Secondly, if Kitron customers products are significantly less recyclable or reparable than their competitors, customers may choose suppliers that are better at circular processes. Kitron could reduce this risk though increased dialogue with customers and knowledge sharing regarding recyclability and repairability of its products, for example through product design, choice of materials, and programs for maintenance and refurbishment. Since Kitron manufactures products which have been designed and specified by our customers our means to influence this matter is limited as compared to companies designing their own products.

5.3. Policies, actions, and targets related to resource use and circular economy

E5-1 | E5-2 | E5-3

Kitron has not yet adopted or implemented any policies, actions and resources, or targets to manage its material impacts, risks and opportunities related to resource use and circular economy, that aligns with the requirements in the ESRS (in accordance with ESRS 1 §33). However, the company recognizes the importance of managing impacts, risks and opportunities related to circular economy and resource use, and is committed to developing respective policies, actions, and targets. Kitron aims to have these in place by 30.06.2026 to support its sustainability efforts and long-term business resilience.

5.4. Resource inflows and use E5-4

Kitron's production inputs can be divided into three categories: electronic components, mechanical drawing parts, and PCBs (Printed Circuit Boards). The inputs are with few exceptions sourced and produced outside Norway.

Electronic components include silicon, copper, tin, gold, silver, tungsten, lead, and aluminum, and are sourced from close to 1407 manufacturers through approximately 1255 supply partners. Mechanical drawing parts includes a wide variety of parts, from metal casting to machine parts, injection molded plastic, sheet metal, and aluminum die casting. PCBs are mainly composed of: 1) Substrate: The base material, typically made of fiberglass-reinforced epoxy resin (FR-4), provides mechanical support and electrical insulation, and 2) Copper Foil: Thin layers of copper are laminated onto the substrate to form the conductive pathways.

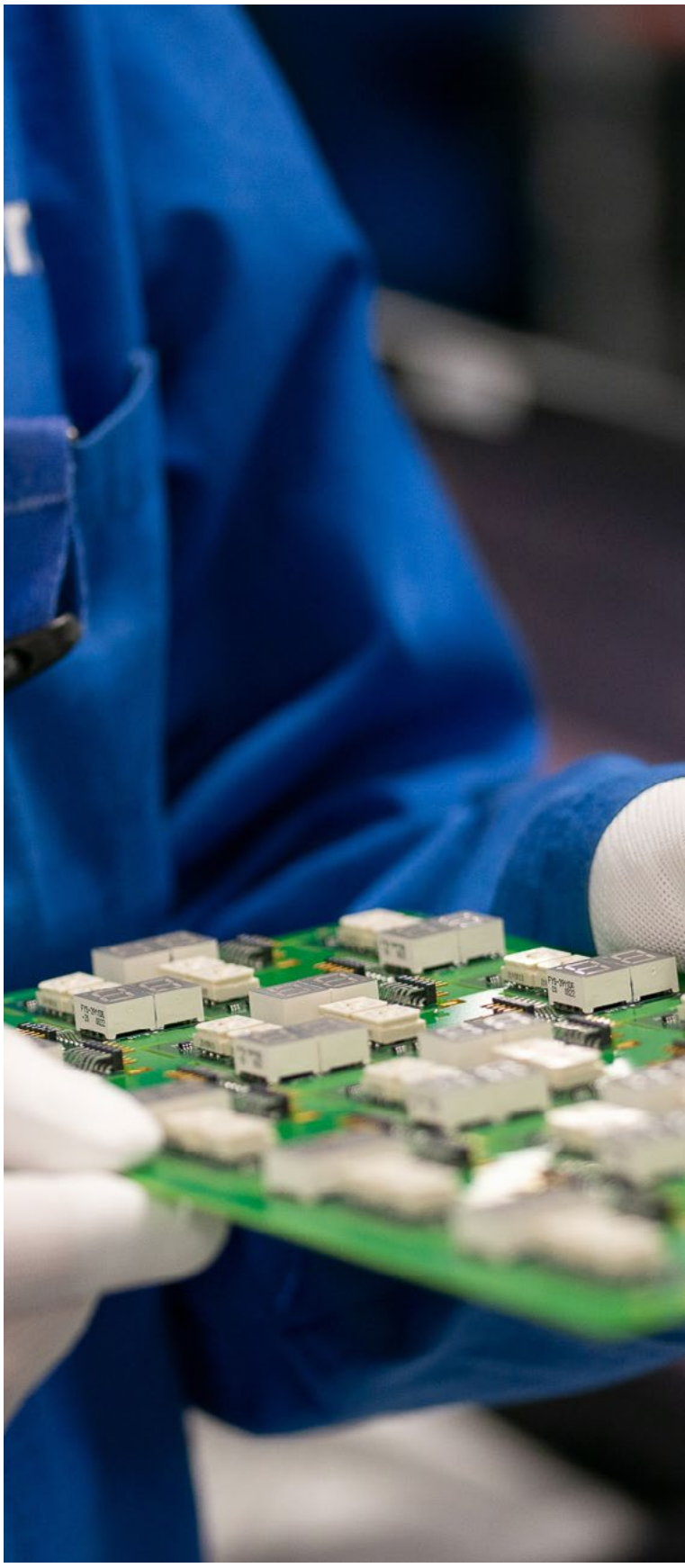
Materials that go into the Kitron's production process include tin for soldering components, various solvents to clean the boards, and conformal coating, which is a protective, thin polymeric film that may be applied to printed circuit boards (PCBs) and other electronic components. Materials used for products packaging include pallets, carton boxes, and ESD bags/bubble wrap.

Kitron's use of biological materials in production is limited to the materials used in products packaging, with the use of pallets and carton boxes.

Kitron's use of secondary reused or recycled components and materials includes primary, secondary, and tertiary use of packaging materials. When mapping the use of reused or recycled components and materials used in Kitron's operations, we can separate between ESD bags, pallets, and carton boxes.

The warehouses control all materials that come in, and the share of packing materials that is reused. Pallets are normally reused, unless they are broken or damaged. Carton boxes and ESD bags are normally customized to fit the product and are therefore rarely reused. The rate of reuse will also vary between locations, but the estimates represent an expected average.

For components and materials used in Kitron's products, most input materials and components do not originate from secondary sources. Furthermore, on an annual basis Kitron purchases components from close to 1407 manufacturers through approximately 1255 supply partners, making it unfeasible to estimate the rates of secondary used materials across suppliers.



5.5. Resource outflows E5-5

5.5.1. Products and materials

Kitron is an Electronics manufacturing services company and produces electronics for our customers who own the Intellectual Property of the product. The work Kitron does can be divided into Printed Circuit Board assemblies PCBAs, modules or complete systems. In the latter case Kitron produces the electronics, sources the remainder of the products needed to finalize the product, assembles the product and tests it. In all the processes, the customer owns and decides the design and choice of materials.

Kitron's core areas of expertise are divided into five key sectors: connectivity, electrification, industry, medical devices, and defence/aerospace. Each of these industries have different demands and requirements, and therefore the products that Kitron manufacture will differ across sectors. Products are classified based on the sectors the customers operate in, and all parts are connected to the customers in our ERP-system. Based on this we calculate how much sales we have in the different sectors. Products adapted for the different industries will also vary in durability, depending on the purpose and characteristics of the product.

Since Kitron does not control the products end-of-life, it is challenging to estimate the exact durability of its products, as this depends on the product users. However, Kitron does control the design and redesign of its products and regularly estimates how long it will take before the products require redesign, also known as New Product Introduction (NPI) design or revision lifetime.

Due to the highly specialized products that Kitron manufacture, it is difficult to compare Kitron's products to the industry average in each segment.

The general procedure is to repair the products, however, at end-of-life repair is not always possible. Furthermore, reparation is not always the preferred solution, as it can be more costly than replacement. The actual rate of products that are repaired therefore depends on the specifications and demands of customers.

Kitron provide several services to enable reparation and to extend the lifetime of its products.

We offer maintenance, repair and refurbishment programs. Refurbishment programs help extend the product's lifecycle, including both software and hardware upgrades. We have in-house software and hardware design expertise if a redesign is required. Kitron also has component information systems (CIS) to assist its customers in identifying replacements for obsolete components.

Most of Kitron's products end up as electronic waste (e-waste) at end-of life. Since Kitron's products are composed of a complexity of materials, including vast amount of minerals, metals, plastics, and cables, and because each product is based on the specific demands of the customer and the relevant target industry, it is challenging to break down the exact product composition on a general basis.

Materials used for products packaging include loading pallets, carton boxes, and ESD bags. Complete system deliveries have different packaging materials based on size and vulnerability.

For PCBA, products are delivered mainly in ESD bags. ESD bags can be recycled, but the process and what they can be turned into depend on their specific type and composition:

- Pink Antistatic Bags: These are typically made from low-density polyethylene (LDPE) and can be recycled into products like plastic lumber, floor tiles, and new packaging materials.
- Metallized Shielding Bags: These bags are more complex as they contain multiple layers, including a thin layer of aluminum. While both the polyethylene and metallized polyester layers can theoretically be recycled, separating them is challenging. As a result, they are often categorized under mixed plastics (Code 7) and can be recycled into items like plastic pallets or composite materials.
- Moisture Barrier Bags: Similar to metallized shielding bags, these also fall under mixed plastics due to their multi-layer construction. They can be recycled into similar products as metallized shielding bags.

The PCBs are thereafter shipped in regular carton boxes.

Loading pallets are also highly reuseable and recyclable. Reparable pallets can be repaired and reused multiple times, while pallets that cannot be repaired can be recycled as chippings or used as solid recovered fuel for energy production.

Kitron currently has no statistics on packaging material recycling after it has been shipped to the customer.


Kitron

5.6. Waste

Kitron is calculating waste data based on the reports received when delivering sorted waste to the recycling plants, by factory. The reports are attached to invoices from the recycling plants and applies to all Kitron's production sites.

Table 5 7 presents Kitron's total amounts of waste , with a breakdown by waste type, operation types, and treatment types, and between hazardous and non-hazardous waste. In 2024, Kitron produced a total of 1017 tons of waste, dispersed across ten different manufacturing sites. 960 tons (94 %) of the waste is classified as non-hazardous, while the remaining 57 tons (6 %) is classified as hazardous. Around 66 % of the waste was recycled, and around 34 % was disposed to incineration or treatment.

Table 5 7: Waste treatment type, separated by waste types.

Treatment type	Total waste	Non-hazardous waste	Hazardous waste
Recovery operation type			
Preparation for reuse	0	0	0
Recycled waste	669 (66 %)	613	56
Other recovery operations	0	0	0
Treatment type			
Incineration	347 (34 %)	347	0
Landfill	0	0	0
Treated waste	1.4 (0.1 %)	0	1.4
Total	1017	960 (94 %)	57 (6 %)

In tons of waste (percent of total waste), 2024. The numbers have not been validated by an external body other than the assurance provider.

5.6.1. Relevant waste streams

Kitron mainly has electronic waste from scrap in production or from inventory. Hazardous waste comes from washing machines that PCBS are washed in, in addition to different types of conformal coating, oils and cleaners from the production machinery. There is also cooling liquid in the environmental chambers that becomes waste of shifted. Waste packaging material from incoming and outgoing goods.

Waste generated from packaging materials include unused paper and cardboard packaging, plastic and wooden packaging, and packaging contaminated by hazardous substances. Kitron also generates municipal waste from its office departments and production sites, such as food waste, paper, plastics, furniture, and appliances. The composition of Kitron's waste differs across countries and based on the type of products that are manufactured in the reporting period.

5.6.2. Composition of waste

Kitron's waste can be divided into several categories. Most of Kitron's waste is generated from processing materials, and is composed of used flux, cleaning water, various solvents, and absorbents. From materials used in production, waste includes different types of plastics, metals, electronic components, paint, and varnish.

5.6.3. Radioactive waste

Kitron does not generate any radioactive waste through its operations.

6. S1 Own workforce

6.1. Interests and views of stakeholders SBM-2

Kitron's workforce is essential for delivering our services, making them a vital stakeholder. Our reliance on our employees naturally integrates their interests and views into our strategy and business model.

Kitron recognises that our business model may impact its workforce, particularly in terms of health and safety at production sites. Operating across multiple locations also increases the risk of inadequate wages. To mitigate these risks, Kitron places significant emphasis on maintaining high health and safety standards at all sites. Without providing competitive wages Kitron would not be able to attract and retain a competent workforce. There are no indications that our strategy or business model exacerbates material impacts.

Kitron actively engages with its workforce across various regions. Employee representatives are present on the Kitron ASA Board, which holds eight meetings annually. Additionally, Kitron has a European Workers Council that discusses strategic topics and actions affecting the workforce.

Employee engagement is organised through multiple channels. Kitron conducts an annual employee survey, currently using the Eletive platform, to cover various work-related topics. In the Nordics, workforce engagement is regulated by law and agreements between employee and employer representatives, with meetings held monthly or quarterly. In other countries, engagement is less formal but includes focus groups based on Eletive survey results to discuss and improve the work environment.

The purpose of engaging with the workforce is to ensure their interests and views are considered in Kitron's strategy and business model. This engagement helps address work-related issues, improve the work environment, and align business objectives with employee needs and expectations.

The outcomes of these engagements are taken into account by the managing directors at each site, who are responsible for coordinating communication with worker representatives and implementing necessary actions if needed.

Kitron understands that the interests and views of our key stakeholders, particularly our workforce, are integral to the company's strategy and business model. During our materiality analysis processes the perspectives of our workers were given consideration.

Currently, Kitron has not made any amendments to its strategy or business model and at this time no further steps are planned to amend strategy or business model specifically to address the interests and views of its stakeholders.

The Board and CMT at Kitron are informed about the views of own workforce concerning the company's sustainability-related impacts through Board meetings where employee representatives are present and employee surveys conducted.

6.2. Material impacts, risks and opportunities and their interaction with strategy and business model SMB-3

Kitron's materiality analysis has identified several key impacts, risks, and opportunities related to working conditions and equal treatment and opportunities for all.

Impacts, risk and opportunities identified as a part of the analysis relate to health and safety. A potential impact identified is that work at Kitron could lead to injuries. While Kitron has very few incidents, primarily minor injuries and no fatalities, there are potential risks associated with workplace processes that could harm employees for example if training is insufficient. Prioritizing health and safety measures can provide an opportunity reduce the risk of workplace incidents, fostering a safer and more productive work environment.

Kitron's workforce, including both permanent and temporary employees, may face challenges related to adequate wages, particularly in regions with lower wage levels or limited labour protections. Providing adequate wages is essential for attracting and retaining the necessary talent to support our operations. If Kitron fails to offer wages that reflect market standards and employee expectations, the company risks being unable to attract and retain skilled workers. This could lead to challenges in maintaining critical competence, resulting in lost revenue, reduced efficiency, and increased costs. On the other hand, by offering competitive wages and ensuring fair working conditions, Kitron can attract and retain skilled workers, maintaining critical competence and improving overall operational efficiency.

The impacts, both positive and negative, are inherently connected to Kitron's strategy and business model, as they directly involve our workforce. Our employees are crucial to delivering our services and achieving our business objectives. Therefore, the way we manage wages, working conditions, training, and safety measures is integral to our overall strategy and business model.

There are no significant risks identified that would necessitate a material adjustment to the carrying amounts of assets and liabilities reported in the related financial statements within the next annual reporting period. Kitron does not anticipate any substantial financial effects from its material risks and opportunities on its financial position relating to our own workforce.

Description of types of employees and non-employees subject to material impacts

All people in the Kitron workforce who can be materially impacted are included in the scope of our sustainability statement. Kitron's workforce comprises own employees, people provided by a third party undertaking primarily engaged in employment activities, and self-employed personnel. The workforce can be broadly categorized into direct and indirect labour.

Direct labor refers to employees, roles, or tasks that are expressly involved with the production of goods and services. This category mainly includes Kitron's own employees and people provided by a third-party undertaking.

Indirect labour encompasses overhead, support functions, sales or management roles. This category primarily consists of Kitron's own employees, with some self-employed people and, in certain instances, personnel provided by a third-party undertaking.

We acknowledge that there may be higher risks for individuals provided by third parties or self-employed personnel, as the level of information Kitron possesses about this segment of the workforce is somewhat more limited compared to our own staff.

Description of material impacts

Kitron has identified individual incidents of minor health and safety incidents relating to our own workforce. Other than minor health and safety incidents we have not identified material negative impacts. There are no indications that these impacts are widespread or systematic as there are very few accidents in general. There are some more registered incidents in Sweden, however this is primarily related to the regulation in Sweden having detailed requirements on registration of incidents.

We have not mapped all activities that may result in positive impacts for our employees. However, we do believe that by providing work opportunities and treating our employees fairly that this will lead to positive effects for our workforce. Continuous training and development of our employees ensure a highly competent workforce benefitting the workforce and Kitron. By offering competitive salaries, we aim to retain workers and have a stable and highly competent workforce.

Currently no impacts on workers as a result of transition plans for reducing negative impacts on environment and achieving greener and climate-neutral operations have been identified.

Description of material risks and opportunities arising from impacts and dependencies on own workforce

As part of our double materiality analysis, Kitron has identified impacts on own workforce, one of which is impact on health and safety for our workers. Although we have experienced very few incidents, and those that have occurred have mostly been minor injuries, this is an impact and could be a potential significant impact on our workforce if the risk was to materialize. However, we have had no fatal injuries in this reporting year. Nevertheless, health and safety remain a material risk for us due to the nature of our work. Focusing on health and safety through training also presents an opportunity for Kitron. Minimizing incidents can positively impact the number of workers needing sick leave or adjustments to their work as a result of health and safety incidents.

Another risk that was identified through our double materiality analysis was related to adequate wages. Kitron operates in different jurisdictions and geographies, with different definitions of adequate and fair wages. Some countries operate with minimum wages and others do not. As described earlier we have both permanent and temporary employees, and a potential impact identified is our permanent and/or temporary staff not receiving fair wages. This potential impact is primarily related to regions with lower wage levels or limited labor protections. We follow local legislations in all countries where we operate, and believe this is crucial to reduce the potential impact of not having adequate wages. Adequate wages that reflect market standards and employee expectation is important for us to attract and retain skilled workers. Not being able to do so would present a risk to Kitron of not maintaining critical competence, which could result in lost revenue, reduced efficiency, and increased cost in the long run.

Currently no impacts on workers as a result of transition plans for reducing negative impacts on environment and achieving greener and climate-neutral operations have been identified.

Information about operations and specific groups of people in our workforce that are at significant risk

Product manufacturing within the ICT sector is generally associated with higher risk of human rights breaches such as incidents of forced labour, compulsory labour and child labour. Risks are generally considered somewhat lower for assembly and final production than for component manufacturing. However, at Kitron we are responsible for our own locations and our operations require skilled labor which again reduces this risk. No cases of forced labour, compulsory labour or child labour has been identified at Kitron.

Kitron has manufacturing facilities in China and Malaysia. In general, these geographies are at a higher risk of incidents of forced or compulsory labour according to the Global Slavery Index. There is also a higher risk of child labour in these geographies. However, Kitron manufacturing requires skilled labour and has high requirements on technical compliance. Our factories are managed and operated by us, allowing us to control the labour practices and standards employed. There is no use of forced labor or child labour at Kitron facilities. We have a technical support center in India, also a geography in general associated with a higher risk of forced labour or compulsory labour, however the use of a highly competent workforce reduces this risk. There is no use of forced labour or child labour at Kitron's technical support center.

The term "child" refers to any person employed under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Workers under the age of 18 should not perform hazardous work and may be restricted from night work with consideration given to educational needs. Kitron has had two young workers over the age of 15 who have worked on our sites during school holidays, however they have not performed work that has affected their schooling or work of a hazardous character.

The direct labour employees may be at greater risk of health and safety accidents as the risk is mainly on the production floor and they are spending most of their time there. Indirect employees might be exposed to the same risk when on the production floor, but they spend less time there and are therefore less exposed. Temporary employees may be at a greater risk given that they have less experience with the production floor compared to permanent staff.

Kitron has not identified material risks and opportunities that relate to specific groups of people rather than the workforce as a whole.

6.3. Policies related to own workforce S1-1

Kitron's Ethical Code of Conduct presents Kitron's obligation and commitment to ethical business practices and describes the standards and requirements which Kitron employees must adhere to in their work. The Ethical Code of Conduct 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.

Health and safety are one of our identified material impacts. The Ethical Code of Conduct outlines that we are committed to providing a safe, healthy and satisfactory workplace. Kitron follows local and international norms and relevant legislation to provide such an environment.

Adequate wages is another one of our identified material impacts. The Ethical Code of Conduct outlines that Kitron has fair employment practices where local norms, laws or collective bargaining agreements is the basic standard.

Training and skills development is identified as a risk. The Ethical Code of Conduct specifies that we value the competences our employees are in possession of and sharing of knowledge and information is an area of priority, as is on-the job development.

The CEO of Kitron, Peter Nilsson, and Chairman of the Board, Tuomo Lähdesmäki, are together accountable for the implementation of the policy together with the Ethics Committee which consists of the Chief HR Officer and members of Kitron's Corporate Management Team. The Ethical Code of Conduct is easily and publicly available to all stakeholders on Kitron's website.

During the drafting of the Ethical Code of Conduct, employee representatives on the Board were involved in setting the policy. This ensured that the interests of key stakeholders were taken into account. The Ethical Code of Conduct is accessible online on Kitron's webpage to all potentially affected stakeholders, and it is reviewed at least every other year.

We monitor the Ethical Code of Conduct through annual employee surveys, to see whether the principles are well known and understood by our employees.

Description of relevant human rights policy commitments relevant to own workforce

Kitron's Ethical Code of Conduct applies to our entire workforce, including Board members, elected officers, permanent and temporary employees, hired staff, consultants, and intermediaries acting on behalf of Kitron. This comprehensive policy addresses our common values, human rights, working environment, and business conduct (see G1).

Kitron is committed to upholding human rights across all our units by adhering to the UN's Universal Declaration on Human Rights, the UN's Convention on the Rights of the Child, and International Labour Organisation (ILO) Conventions. Our human rights commitment is also set forth in our Ethical Code of Conduct.

Our general approach to ensuring respect for human rights and labour rights for our workforce is based on our Ethical Code of Conduct. This policy sets forth the standards for the entirety of our workforce. We have whistleblowing procedures in place to address ethical issues, breaches of laws, or other concerns relating to the respect for human rights, including labour rights. All employees at Kitron are required to attend periodic training on the Ethical Code of Conduct to ensure that these values are understood and implemented.

Kitron owns its factories, equipment, and systems, which enables us to maintain high standards in respecting human and labour rights within our workforce. Additionally, we have HR departments in all locations responsible for ensuring compliance with local laws and regulations.

Disclosure of general approach in relation to engagement with people in its own workforce

Kitron has not adopted a general approach in relation to engagement with people in its own workforce, however we have some forms of employee engagement. An annual employee survey is conducted, inviting all employees to provide feedback on various aspects of the working environment at Kitron. The survey results are analysed, and action plans are developed and implemented to address identified issues and continuously improve the working environment.

In locations where trade unions and similar organisations represent our workforce, Kitron engages with these. We maintain open lines of communication to ensure that the concerns and suggestions of our employees are heard and addressed.

In addition to the annual survey, Kitron encourages regular dialogue between employees and management through various channels, such as meetings and direct feedback sessions.

Kitron ASA Board has representatives from the workforce in the Board, which is also the case in Norway, Sweden, Denmark and Lithuania. Kitron ASA Board meetings are 8 meetings a year whereas local board meetings are on average 3 meetings a year.

We will consider and assess the need to adopt a general approach in the coming year.

Remedy for human rights impacts

Kitron has not yet encountered a situation requiring the remediation of human rights impacts. We have mechanisms in place to report concerns related to human rights, such as our whistleblowing channel (described in more detail below).

Alignment of our policies with relevant internationally recognised instruments

Our Ethical Code of Conduct sets out requirements aligned with the following internationally recognised instruments:

- UN's Universal Declaration on Human Rights and the two Covenants that implement it
- The UN's Convention on Rights of the Child and International Labour Organisation Conventions (ILO conventions).

Kitron is also a UN Global Compact Signatory and supports the ten UN Global compact principles.

Trafficking in human beings, forced labour or compulsory labour and child labour

Our Ethical Code of Conduct addresses trafficking in human beings, forced labour and child labour.

Kitron opposes all forms of forced and compulsory labour. We are dedicated to ensuring that all employment practices within our organisation are voluntary and free from coercion. This commitment is integral to our efforts to uphold the dignity and rights of all employees.

Furthermore, Kitron shall not engage in or support any use of child labour. If a young worker is employed, their employment must be controlled and arranged according to legal requirements in terms of safety, work hours, and guidance. This ensures that their work does not interfere with compulsory schooling and that they are protected from exploitation and harm.

In addition to these measures, Kitron is vigilant in opposing any form of human trafficking. We are committed to maintaining a workplace that is free from exploitation and abuse.

Our Ethical Code of Conduct explicitly addresses trafficking, forced labour or compulsory labour and child labor. Our Ethical Code of Conduct serves as a guiding document for

all our operations. By adhering to these principles, Kitron ensures that we respect and protect the human rights of all individuals within our workforce.

Workplace accident prevention

Health and safety in the working environment are very important to Kitron and is to be ensured to provide a safe, healthy and satisfactory workplace. Kitron follows local and international norms and relevant legislation to provide such an environment. While Kitron does not have a common workplace accident prevention policy or management system in place for Kitron as a group, each site actively works on managing health and safety risks and preventing accidents. This decentralised approach allows each location to address specific risks and comply with local regulations effectively.

Elimination of discrimination

Kitron's Ethical code of conduct clearly states that Kitron opposes discrimination in any form, e.g. due to race, nationality, gender, sexual orientation or religion. Beyond our Ethical Code of Conduct, we have no specific policies aimed at elimination of discrimination.

Kitron's Ethical code of conduct clearly states that Kitron opposes discrimination in any form, e.g. due to race, nationality, gender, sexual orientation or religion. While our Ethical Code of Conduct may not explicitly cover every ground for discrimination, we maintain a comprehensive overview of prohibited discrimination grounds applicable to all the countries in which we operate. Our Ethical Code of Conduct stipulates that we shall comply with applicable laws and regulations, and we are committed to consider other grounds for discrimination prohibited under national legislation in all countries we operate in.

Diversity and inclusion

Kitron currently does not have specific policy commitments related to inclusion or positive action for people from groups at particular risk of vulnerability within our workforce.

Procedures for the implementation of policies

Kitron currently does not have specific procedures to implement our Ethical Code of Conduct. However, we ensure that all employees are well-informed about the policy through comprehensive training and awareness programmes. Management is dedicated to communicating the Ethical Code of Conduct effectively and providing guidance to ensure that employees understand and adhere to these standards.

The working environment in Kitron is characterized by openness, communication, and respect for the individual. Diversity, and a balanced work force in terms of gender, is recognized as strength and an advantage. Fair employment practises following local norms, laws or collective bargaining agreements is the basic standard in all Kitron entities. Kitron upholds the freedom of association and recognizes the right to collective bargaining. No form of discrimination, harassment or bullying is tolerated.

Kitron's Ethical code of conduct clearly states that Kitron opposes discrimination in any form, e.g. due to race, nationality, gender, sexual orientation or religion.

Each employee in Kitron must ensure that he or she is knowledgeable of and perform their duties in accordance with the requirements in the Kitron Ethical Code of Conduct and applicable laws and regulation.

Management must ensure that activities within its area of responsibility are carried out in accordance with the Kitron Ethical Code of Conduct. Management is also responsible for communicating the Ethical Code of Conduct and for providing guidance for the interpretation and application of the Code.

6.4. Processes for engaging with own workforce and workers' representatives about impacts S1-2

Kitron has not adopted a general approach in relation to engagement with people in its own workforce, however we have some forms of employee engagement.

We conduct an annual survey, we engage with our workforce and workers' representatives where relevant, depending on the organisational structure in different companies and locations. In some locations, there are formal forums, while in others, there are focus groups and similar arrangements. The managing director at each site is responsible for coordinating communication with workers' representatives and implementing actions. We have employee representatives on the Kitron ASA Board. We will consider and assess the need to adopt a general approach in the coming year.

6.5. Processes to remediate negative impacts and channels for own workforce to raise concerns S1-3

Kitron is committed to providing for or cooperating in remediation where we have caused or contributed to a material negative impact on people in our own workforce or workers in our value chain. Although we have not identified any material negative impact on people in our workforce for the past reporting year, we remain dedicated to addressing such issues should they arise. For further details, see S-17.

Channels to raise concerns and mechanisms for handling grievances or complaints

Kitron has established multiple channels for employees and workers in our value chain to raise concerns or needs directly with the organisation, including grievances or complaints related to employee matters. These are established by Kitron itself.

Employees can report issues to their immediate superior, the superior's superior, or an employee representative. Environmental and safety concerns can be reported to the relevant representative, HSE-manager, or company health service, while financial matters may be reported to the Finance Manager. Each site has designated contact persons, including the Managing Director, HR Manager, and the main employee representative. If necessary, employees can also report directly to the Chairman of the Group Ethics Committee or the CHRO or to the Chairman of the Audit Committee for Kitron ASA.

Kitron has a whistleblowing procedure that allows employees and workers in the value chain to voice their concerns either anonymously or directly to their leader, HR, the Kitron Ethics Committee, or the Chairman of the Risk and Audit Committee. The Ethics Committee will then follow up and conclude the case, ensuring that all reports are handled with confidentiality and integrity.

Kitron encourages the use of various collaborative forums to address and resolve concerns at the local level. Employees can always refer to their leader or HR to raise concerns, which are typically resolved through these existing forums.

Kitron supports the availability of channels to raise concerns by posting information online about our whistleblowing channels and providing training to all employees on their use.

Kitron tracks and monitors issues raised and addressed through various channels to ensure their effectiveness. Statistics on the number of cases handled by the Ethics Committee are presented annually. This regular reporting helps to evaluate the performance of our channels and ensures that concerns are being addressed appropriately and efficiently. By analysing these statistics, Kitron can identify trends, improve processes, and ensure that our commitment to ethical practices and employee well-being is upheld.

Kitron ensures that its workforce is aware of and understands the structures and processes in place to raise concerns through comprehensive onboarding training and biennial training sessions on the Kitron Ethical Code of Conduct, which includes the whistleblowing procedure. The fact that concerns are raised every year indicates a level of trust in the process. However, no formal investigation has been conducted to assess the trustworthiness of the procedure beyond this observation.

Kitron has yet to evaluate the extent to which value chain workers are informed about and have confidence in these structures and processes.

It is clearly stated in the Ethical code of conduct that Kitron will not tolerate any form of retaliation against any person who has raised an ethical or legal concern in good faith. This protection applies even if the report does not turn out to be an actual violation.

6.6. Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions S1-4

We have not yet implemented specific action plans or allocated dedicated resources to manage material impacts. We are continuously working on managing identified material risks and opportunities related to our own workforce, utilising existing resources within our budget. The approach and efforts vary across our different sites.

Kitron has no additional actions taken, planned, or underway beyond our existing measures to prevent or mitigate negative impacts on our workforce.

No material impacts necessitating remedial action have been identified. Hence, there are no actions planned or underway to mitigate material risks arising from impacts and dependencies on our own workforce, nor is there a system in place to track the effectiveness of such measures.

The results of the employee survey serve as the basis for implementing initiatives and actions aimed at delivering positive impacts on the workforce. By analysing the feedback from the survey, Kitron identifies areas for improvement to positively impact our workforce.

The process for identifying necessary and appropriate actions in response to actual or potential negative impacts on our workforce involve multiple channels. Actions may be defined by the local management team based on the employee survey results or feedback received in relevant forums or through employee representatives. Additionally, focus groups may be set up to discuss the particular actual or potential negative impact on and to identify specific actions to address any concerns or issues raised by employees.

Currently, there are no specific actions planned or underway to pursue material opportunities in relation to our workforce and Kitron has not allocated resources to the management of material impacts.

Kitron is committed to ensuring that our practices do not cause or contribute to material negative impacts on our workforce. We have established channels through which employees can voice any concerns or issues related to our practices.

Currently, no specific measures have been taken to mitigate negative impacts on workers arising from the transition to a greener, climate-neutral economy.

6.7. Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities S1-5

The target of zero fatalities aligns with Kitron's commitment to ensuring the health, safety, and well-being of all employees. This objective is embedded in our Ethical Code of Conduct and health and safety policies, reflecting our dedication to creating a safe working environment. The target is measurable and absolute and the scope of the target includes the totality of Kitron's workforce. The baseline value for this target is the current number of fatalities, which is zero. The baseline year is the most recent reporting year, 2024, in which zero fatalities were recorded.

The target applies indefinitely, with the goal of maintaining zero fatalities on an ongoing basis. Given the absolute nature of the target, there are no specific interim targets and our goal and target must be to achieve zero fatalities. Stakeholders have not been involved in the target setting. There was no direct involvement of the workforce or workforce representatives in setting the target or tracking performance against the target of zero fatalities. Our workforce and workforce representatives have not yet been directly engaged in identifying lessons or improvements as a result of undertakings performance.

6.8. Characteristics of the undertaking's employees S1-6

The following sections provide insights into the distribution of our employees by gender, country, employment type, and region, offering an understanding of the characteristics of Kitron's workforce. As the numbers indicate, we have some temporary staff. This is due to Kitron's commitment to being a customer-centered business, which sometimes necessitates the engagement of temporary staff to effectively meet fluctuating demand. We have a relatively balanced workforce in terms of gender distribution, although this varies across different parts of the company and regions. For instance, our manufacturing factories have traditionally employed a higher proportion of women. Nonetheless, we are committed to ensuring equal opportunities for all employees. More detailed information regarding gender-related topics, including compensation, can be found in the report on compensation and the sustainability report.

646 of our employees left the undertaking. Average number of employees 2803. Average turnover: 646/2803=23.0%

Due to lower demand in 2024 compared to 2023, initiatives to adjust the number of employees to the new demand level were undertaken. Employee data has been aggregated by local HR departments on site level and consolidated for group level. Employees are reported on headcount level and at end-of period.

In the financial statements FTE is used as it is connected to operations, but Headcount is also mentioned. To compile data, timesheet and invoices have been used. Non-employees numbers are reported in head count, and at end of period.

Table 6 1 Employee head count by gender

Gender	Number of employees (head count)
Male	1 215
Female	1 349
Other	0
Not reported	0
Total employees	**2 564**

Table 6 2 Employee head count in countries with at least 50 employees representing at least 10% of total number of employees

Country	Number of employees (head count)
Norway	534
Sweden	329
Lithuania	604
China	459

Table 6 3: Employee head count by type of employment.

	Male	Female	Total
Number of employees headcount	1 215	1 349	2 564
Number of permanent employees	1 071	1 198	2 269
Number of temporary employees	125	143	268
Number of non-guaranteed hours employees	19	8	27

6.9. Collective bargaining coverage and social dialogue S1-8

Sweden, Norway and Lithuania are countries with significant employment with a coverage rate of at least more than 10% of our total employees. All three countries have collective bargaining agreements. 58% of our total employees are covered by collective bargaining agreements For Norway and Sweden 100% are represented by workers' representatives. For Lithuania workplace representation is in the 0-19% bracket.

Table 6-4 Collective bargaining coverage and social dialogue in countries with significant employment in the EEA

Coverage Rate	Collective Bargaining Coverage	Social Dialogue
0-19%		Lithuania
20-39%		
40-59%		
60-79%		
80-100%	Norway, Sweden, Lithuania	Norway, Sweden

Kitron has a European workers council agreement.

6.10. Diversity Metrics S-9

Table 6 5: Gender distribution in headcount and percentage of employees at top management level

Male	Female	Total
6	1	7
85,7%	14,3%	100

Table 6 6: Distribution of employees by age.

	Headcount	Percentage
Distribution of employees under 30 years old	551	21 %
Distribution of employees between 30 and 50 years old	1 352	53 %
Distribution of employees over 50 years old	661	26 %
Total age-distribution	2 564	100 %

Top management is defined as the group corporate management team. We have used the definition of top management as one and two levels below the CMT.

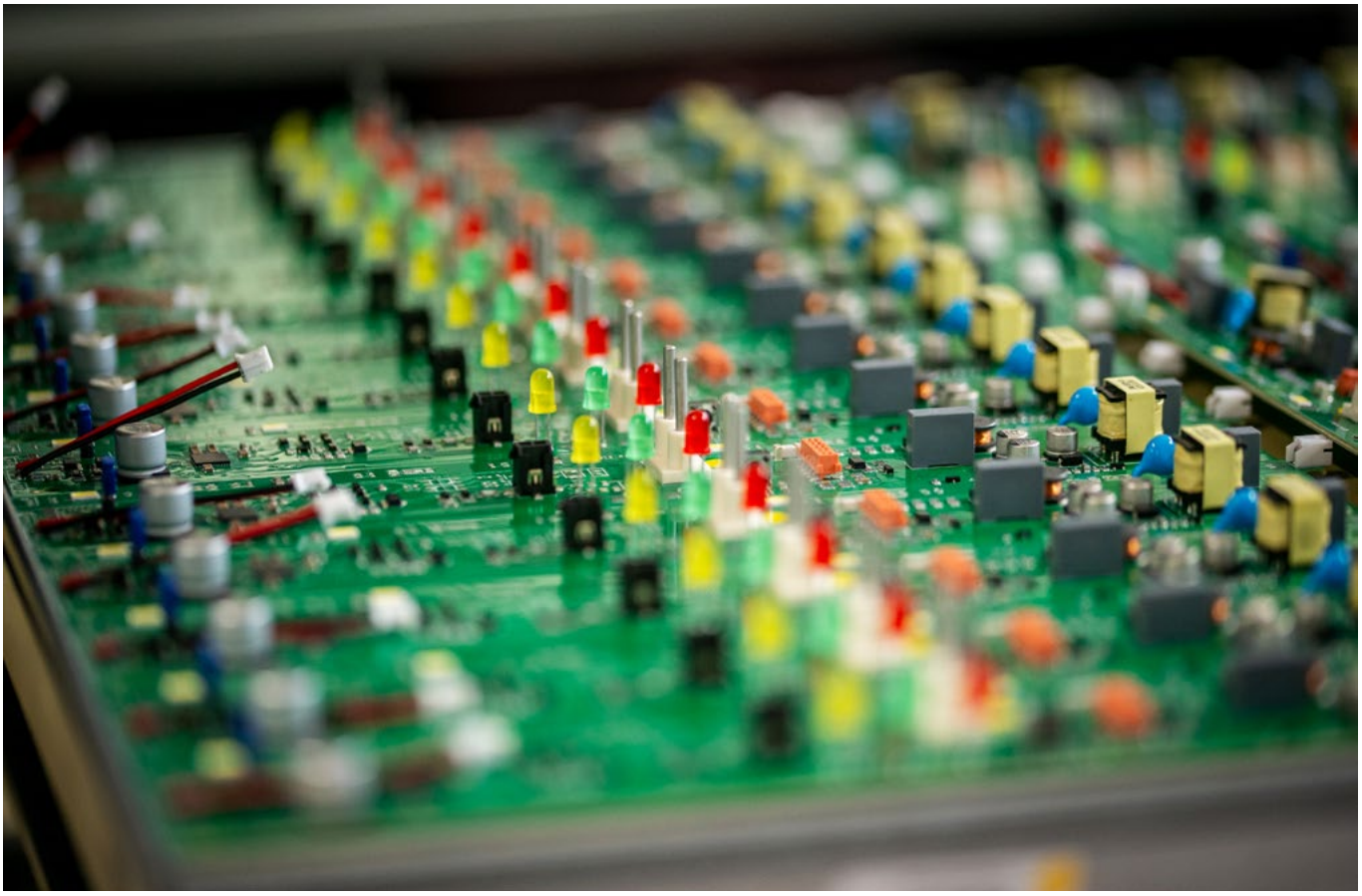
6.11. Adequate Wages S1-10

In total	100 %

Kitron has no workers being paid less than the minimum wage/adequate wage, this means all our workers are paid an adequate wage in line with applicable benchmarks

The minimum wage is the lowest wage that employers are legally obliged to pay their employees.

The lowest wage was analysed for the lowest pay category, excluding interns and apprentices. It was based on the basic wage plus any fixed additional payments that are guaranteed to all employees.



6.12. Health and safety metrics S-14

Table 6 7: Percentage of people in our workforce covered by health and safety management system

	Percentage (%) that are covered:
Number of people that are covered by the company's health and safety management system	100%

All companies have either a legal requirement and or an ISO certification for Health and Safety Managements system.

Table 6 8: Number of incidents associated with work-related injuries, ill-health and number of recordable work-related accidents

	Number of events in reporting period:
Fatalities in own workforce as result of work-related injuries and work-related ill health	0
Fatalities as result of work-related injuries and work-related ill health of other workers working on undertaking's sites	0
Recordable work-related accidents for own workforce	7

Kitron has had no fatalities. There are however 7 recordable events where the employee afterwards was unable to work for one or more days. We define work-related ill health as those cases outlined in the ILO List of Occupational Diseases. The rate of recordable work-related injuries in own work force is 1.34.

6.13. Remuneration metrics (pay gap and total remuneration) S-16

Table 6 9: Gender pay gap in KEUR annual average pay

	Male	Female
Average pay	38.6	23.6
% pay gap		39 %

The pay gap is affected by the lower number of females than men in indirect and higher positions.

Average pay male and average pay female are calculated by site. The average pay is the multiplied by headcount to get a total pay and total pay female by site. The sites total pay per site is then added to make a total payment for all male and then divided by the total number of male to get the average pay by male for the group and similar for female.

Annual total remuneration for the highest paid individual is 1181 KEUR. The sites have then given a median per site. We thereafter make an estimate on the median based on the weighted average on the median per site, by multiplying the median by headcount and then dividing the sum by the total headcount, which gives 25.2 KEUR. 1181/25.2=46.9.

Kitron employs a substantial number of employees in CEE and Asia. The company's headquarter is in Scandinavia.

6.14. Incidents, complaints and severe human rights impacts S-17

There has been one reported incident of discrimination through our whistleblowing channel, which was investigated and followed up. The investigation, handled by a third-party, found no evidence of discrimination in the filed case. Thus, there have been no work-related incidents of discrimination on the grounds of gender, racial or ethnic origin, nationality, religion or belief, disability, age, sexual orientation, or other relevant forms of discrimination involving internal and/or external stakeholders across operations in the reporting period. This includes incidents of harassment as a specific form of discrimination.

There have been no complaints filed to the National Contact Points for OECD Multinational Enterprises.

There have been no fines, penalties, or compensation for damages as a result of incidents of discrimination, including harassment and complaints filed.

There have been no fines, penalties, or compensation for damages as a result of violations regarding work-related discrimination and harassment, and therefore no relevant amounts are presented in the financial statements.

Kitron has a system in place for reporting irregularities or concerns related to social and human rights matters, including work-related grievances, incidents, and complaints. This system was consulted to compile the data for our disclosures above.

There have been no severe human rights issues or incidents connected to our own workforce, no cases of non-respect of UN Guiding Principles and OECD Guidelines for Multinational Enterprises, and no fines, penalties, or compensation for such issues.

7. S2 Workers in the value chain

7.1. Interests and views of stakeholders SMB-2

One of Kitron's key stakeholder groups includes workers within the value chain. At present, Kitron has not engaged directly with these workers.

Kitron's business model incorporates the rights of value chain workers through the implementation of our Supplier Code of Conduct. This code mandates that our suppliers respect and uphold the rights of their workers. In regions where sourcing is particularly challenging, such as areas affected by conflict minerals, we strive to minimise sourcing from these regions to the greatest extent possible.

Our business model involves delivering products to our clients, and in some cases, our clients determine the suppliers we use for production. This can both exacerbate and mitigate material impacts on value chain workers. To address these impacts, we have implemented an ethical code of conduct for our suppliers, which is an integral part of our business model.

The actual and potential impacts on value chain workers are indirectly connected to Kitron's strategy and business model. We source components that may originate from mines where human rights abuses occur. However, our Supplier Code of Conduct is specifically designed to protect the rights of these workers. This inclusion of value chain workers' rights in our Supplier Code of Conduct, along with our systematic approach to managing conflict minerals, has influenced our business model.

In the event that breaches of human rights are identified within our value chain, Kitron will inform the customer and request alternative components, enabling the termination of business relationships with non-compliant suppliers. As Kitron can only source components approved by our customers, the responsibility for the choice of suppliers and the impact on workers in the value chain is shared with our customers. Our goal is to mitigate negative impacts wherever possible, ensuring that our business practices align with our commitment to ethical conduct and the protection of human rights.

The Board of Directors has been briefed on sustainability-related impacts. However, Kitron has not engaged in any specific stakeholder dialogue with value chain workers that has been relayed to the Board or CMT.

7.2. Material impacts, risks and opportunities and their interaction with strategy and business model SMB-3

Through Kitron's materiality analysis we have identified potential negative impacts on workers in the value chain, specifically relating to forced labour, adequate wages and collective bargaining. Kitron could potentially source minerals from conflict-affected or high-risk areas where mining and production may contribute to human rights abuses such as the use of forced labour including child labour. Another impact identified is value chain workers facing challenges relating to fair wages and poor working conditions and limited right to collective bargaining, particularly in regions with weaker labor standards and enforcement. Kitron has not identified risks and opportunities in our materiality analysis when it comes to workers in the value chain.

As Kitron relies on sourcing minerals, this potential impact affects our business model. To address this, we require our suppliers to exercise due diligence on the source and chain of custody of these minerals. Additionally, we have implemented independent supplier due diligence procedures to ensure that all our suppliers meet our stringent requirements. These measures are part of our ongoing efforts to mitigate risks related to human rights abuses, such as forced labour and inadequate working conditions, within our value chain.

No financial effects have been identified from Kitron's material risks and opportunities. Kitron does not see a significant risk of a material adjustment within the next annual reporting period. Given our strategy to manage these risks and opportunities, we do not expect substantial changes in our financial position, financial performance, or cash flows within these time horizons.

All value chain workers who can be materially impacted by our undertaking, including impacts connected with our own operations and value chain, through our products or services, as well as through our business relationships, are included in the scope of our disclosures.

Description of types of value chain workers subject to material impacts, and geographies with specific risks

Workers in Kitron's upstream value chain, such as those

involved in the extraction of metals or minerals, harvesting of commodities, refining, manufacturing, or processing, are subject to material impacts. This is due to the electronic component and PCB manufacturing processes, which involve raw materials like gold, silver, copper, palladium, platinum, tin, nickel, and rare earth metals. The scope of disclosure for workers in the value chain is limited to workers working for entities in the undertaking's upstream value chain (e.g., those involved in the extraction of metals or minerals or harvesting of commodities, in refining, manufacturing or other forms of processing);

The electronical component and PCB manufacturing includes raw materials such as gold, silver, copper palladium, platinum, tin, nickel and rare earth metals.

The workers in Kitron's upstream value chain in the minerals mining industry are subject to potential material impacts. This is particularly relevant due to the significant risk of child labour and forced or compulsory labour identified by the UN in the mining sector.

Mining of minerals used in electronic components and PCBs occurs in various regions worldwide. While we conduct due diligence to ensure our raw materials are conflict-free, our knowledge of the exact origins of these minerals, outside of conflict mineral areas, remains limited. The Norwegian Agency for Public and Financial Management refer to the following commodities and geographies being at significant risk of child labour or of forced or compulsory labour

- Gold: China, Australia, Russia, USA, Canada, Peru, Indonesia, Ghana and South Africa
- Tantalum: DRC, Rwanda, Brazil, Nigeria, and China.
- Tin: China, Indonesia, Myanmar, Peru, Brazil, Bolivia, and DRC.
- Tungsten (Wolfram): China, Vietnam, Mongolia, and Russia.

Material impacts

Kitron recognises the potential for material negative impacts within our value chain, although we currently have no information indicating that such impacts have occurred. Potential risks include sourcing raw materials from regions where child labour and forced labour are prevalent. Value chain workers may face challenges related to fair wages and working conditions as well as the right to organize, especially in regions with weaker labour standards or enforcement that Kitron source from.

Material risks and opportunities

Kitron has not identified any material risks or opportunities arising from impacts and dependencies on value chain workers at this time.

Kitron has not conducted an analysis to understand how workers with particular characteristics, those working in specific contexts, or those undertaking particular activities may be at greater risk of harm. However, we have gained an understanding that mining of minerals is an area where there is a greater risk of harm to workers in the value chain.

Kitron has not identified any material risks or opportunities arising from impacts and dependencies that relate to specific groups of value chain workers, such as particular age groups or workers in a specific factory or country.

7.3. Policies related to value chain workers S2-1

The Kitron Supplier Code of Conduct outlines requirements for labour rights, health and safety, environmental practices, and anti-corruption measures. It includes standards for freely chosen employment, child labour avoidance, working hours, wages and benefits, humane treatment, non-discrimination, freedom of association, occupational safety, emergency preparedness, pollution prevention, and business integrity.

The policy applies to all suppliers and their sub-contractors engaged in Kitron's supply chain. Suppliers must comply with applicable legislation, rules, and regulations in the countries where they operate.

The policy supports the UN's Universal Declaration of Human Rights and requires suppliers to ensure they are not complicit in human rights abuses.

The policy relates to several of the material impacts identified in our double materiality analysis. Kitron could potentially source materials from conflict-affected or high-risk areas, where mining and production may contribute to human rights abuses or unethical practices. Our policy addresses the responsible sourcing of minerals, and have requirements for suppliers that they shall have policies related to responsible sourcing as well as exercising due diligence on source and chain of custody of minerals. Due diligence measures should be made available to Kitron by request.

Another impact identified is that workers in the value chain may face challenges related to fair wages, adequate working conditions, and the right to organize. The policy addresses labour rights, including working hours, wages and benefits and freedom of association.

The policy considers the interests of key stakeholders such as upstream value chain workers by promoting fair labour practices, safe working conditions, environmental sustainability, and ethical business conduct. Its aim is to ensure that value chain workers' rights are respected and that suppliers adhere to high standards of integrity and transparency.

The Supplier Code of Conduct is communicated to all appropriate employees, suppliers, and sub-contractors engaged in the supply chain. Suppliers are expected to ensure their sub-contractors comply with the policy and provide means for employees to report non-compliance confidentially.

The Supplier Code of Conduct is accessible online on Kitron's webpage to all potentially affected stakeholders.

The supplier code of conduct is approved by the Board of Kitron ASA. Within the CMT, the supply chain is overseen by the COO and the Supply Chain Director for group supply agreements.

Description of relevant human rights policy commitments relevant to value chain workers

Kitron Supplier code of conduct states that in all activities, Kitron's suppliers must comply with applicable legislation, rules and regulations in the countries in which they operate. If any legislation, rules or regulations are in conflict with the Kitron Supplier Code of Conduct, the highest standard shall be applied.

The suppliers are expected to support the UN's Universal Declaration of Human rights and ensure that they are not complicit in human rights abuse.

General approach in relation to respect for human rights relevant to value chain workers

Kitron's Code of Conduct and Supplier Code of Conduct outline our expectations for suppliers regarding the respect for human rights. Suppliers are required to comply with applicable legislation, rules, and regulations in the countries where they operate. In cases where local legislation conflicts with the Kitron Supplier Code of Conduct, the highest standard shall be applied. Suppliers are also expected to support the UN's Universal Declaration of Human Rights and ensure that they are not complicit in human rights abuses.

To ensure adherence to these commitments, suppliers must maintain appropriate records to demonstrate conformance with the requirements of the Supplier Code of Conduct. In the event of an audit to verify compliance, Kitron personnel, Kitron's customers, or Kitron consultants shall have access to the relevant records and any part of the premises where work under the contract is being performed, including subcontractors' suppliers' premises. This rigorous approach ensures that our suppliers uphold the highest standards of human rights and ethical practices throughout the value chain.

Engagement with value chain workers
Kitron does not engage directly with value chain workers or their representatives. However, value chain workers can engage with Kitron if they need to report irregularities or concerns. These reports will be handled thoroughly by Kitron to ensure that any issues are addressed appropriately.

Measures to provide and (or) enable remedy for human rights impacts
Kitron is committed to upholding human rights across all operations and our supply chain. We will disengage with any supplier found to be violating our human rights guidelines and are dedicated to providing or cooperating in remediation where appropriate. Although we have not yet encountered a situation requiring remediation, we have mechanisms in place, such as our whistleblowing channel, to report and address concerns. We are committed to investigating and resolving any human rights issues that may arise, ensuring a responsible and ethical business environment.

Policies addressing trafficking in human beings, forced labour or compulsory labour and child labour
The suppliers are expected to support the UN's Universal Declaration of Human rights and ensure that they are not complicit in human rights abuse. This is addressed in our Ethical Code of Conduct and in our Supplier Code of Conduct.

Forced, bonded or indentured labour or involuntary prison labour is not to be used. All work must be voluntary, and workers should be free to leave upon reasonable notice. Workers shall not be required to hand over government-issued identification, passports or work permits as a condition of employment.

Child labour is not to be used in any stage of manufacturing. The term "child" refers to any person employed under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace apprenticeship programs, which comply with all laws and regulations, is supported. Workers under the age of 18 should not perform hazardous work and may be restricted from night work with consideration given to educational needs.

Our supplier code of conduct does not explicitly address trafficking in human beings.

However, the suppliers are expected to support the UN's Universal Declaration of Human rights and ensure that they are not complicit in human rights abuse.

Supplier code of conduct
Kitron has a supplier Code of Conduct that applies to both our suppliers and sub-suppliers.

Alignment of our policies with relevant internationally recognised instruments
Our policies are aligned with the UN's Universal Declaration of Human Rights. Our policies are not aligned with the United Nations (UN) Guiding Principles on Business and Human Rights. We have not received any reports of non-respect of the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises involving value chain workers in our upstream and downstream value chain.

7.4. Processes for engaging with value chain workers about impacts S2-2

Kitron does not engage directly with value chain workers or their representatives. However, we have established mechanisms to ensure that these workers have the opportunity to report any irregularities and concerns.

Through our whistleblowing channel, value chain workers can confidentially raise issues related to their working conditions, human rights, and other ethical concerns without fear of retaliation.

7.5. Processes to remediate negative impacts and channels for value chain workers to raise concerns S2-3

Our process to remediate negative impacts and channels to raise concerns are identical to those open to our own workforce. See S1-3.

7.6. Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions S2-4

No specific action plans or resources have been allocated to address material impacts, risks and opportunities related to value chain workers.

There are currently no specific actions planned or underway to prevent, mitigate, or remediate material negative impacts on value chain workers, we have implemented a robust Supplier Code of Conduct. This code is designed to uphold high standards of ethical behaviour and to prevent any negative impacts on workers.

No actual material impacts for value chain workers have been identified at Kitron. However, we are committed to provide for or cooperate to enable remedy where relevant.

Kitron has no additional initiatives or processes specifically aimed at delivering positive impacts for value chain workers. Consequently, we do not assess or track effectiveness beyond addressing irregularities or concerns brought to our attention.

Description of approach to taking action in relation to specific material negative impacts on value chain workers

We have identified specific material negative impacts in our double materiality assessment, this is described under 7.2.

Our general approach to taking action when it comes to workers in the value chain is related to our supplier management processes. At Kitron, we perform supplier due diligence to ensure new suppliers meet our quality and ethical standards. This process involves a three-step procedure: supplier onboarding, supplier assessment, and supplier audits. These steps help us identify and assess potential material negative impacts on value chain workers, ensuring compliance with our Ethical and Supplier Codes of Conduct.

Kitron affects the workers in the value chain directly through our purchasing, supplier selection, and quality management processes, as well as indirectly through our business relationships and our approach to specific material negative impacts is closely intertwined with our purchasing practices. This includes our work on responsible sourcing of minerals and our Preferred Partner program.

We have identified that Kitron potentially could source from conflict-affected areas or high-risk areas. Conflict minerals are natural resources extracted in conflict zones and sold to perpetuate fighting. The most commonly identified conflict minerals are tin, tantalum, tungsten, and gold, often referred to as 3TG12. These minerals are often mined under conditions of armed conflict and human rights abuses, particularly in the Democratic Republic of Congo (DRC) and surrounding regions.

Kitron secures responsible sourcing by continuously tracking the source of the 3TG12 content in raw materials and strive to be conflict-free. Conflict-free ensures that the minerals used do not contribute to human rights abuses or armed conflict. We have processes in place to mitigate these identified potential impacts such as requirements to our suppliers that they shall exercise due diligence on the source and chain of custody of these minerals as well as making their due diligence measures available on request.

Kitron production inputs can be divided into three parts: electronic components, mechanical drawing parts and PCB (Printed Circuit Boards), and the inputs are with few exceptions sourced and produced in different regions of the world. See table below for procurement of these inputs from our Preferred Partners Program.

Table 7 1: Share of procurement from preferred partners.

Input	Procured from Preferred Partners (in value) 2024
Mechanical drawing parts	15 percent
Electronic components	52 percent
Printed Circuit Boards (PCBs)	52 percent

Processes to provide or enable remedy in event of material negative impacts

We will provide for and cooperate in enabling remedy where relevant. We have available channels where value chain workers can raise their concerns, this information is available online. Since we have not encountered material negative impacts to date, we have not yet assessed the effectiveness of these processes. We will investigate any concerns relating to material negative impact and based on investigations and stakeholder involvement provide or enable remedy if deemed relevant and appropriate.

Actions to mitigate material risks arising from impacts and dependencies on value chain workers, or to pursue material opportunities

Currently, no specific actions are planned or underway to mitigate material risks arising from impacts and dependencies on value chain workers. Consequently, there is no tracking of effectiveness in this area.

No specific actions are planned or underway to pursue material opportunities in relation to value chain workers.

How Kitron ensures that own practices do not cause or contribute to material negative impacts on value chain workers

Kitron ensures that our practices do not cause or contribute to material negative impacts on value chain workers by adhering to applicable laws and regulations and by respecting human rights. We are committed to acting in a socially responsible manner across all aspects of our value chain.

Kitron's business activities and internal operations are conducted with a high level of integrity and with a clear ambition to be a socially responsible company. To support this commitment, Kitron has established policies, including our Ethical Code of Conduct and Supplier Code of Conduct. These documents outline our expectations for ethical behaviour and compliance with human rights standards, also relevant for value chain workers.

Furthermore, workers in the value chain are encouraged to report any concerns or irregularities if they experience that Kitron's practices cause or contribute to negative impacts. By maintaining these standards and providing mechanisms for reporting and addressing concerns, Kitron strives to prevent any material negative impacts on value chain workers and to uphold our commitment to ethical and responsible business practices.

Severe human rights issues and incidents connected to upstream and downstream value chain, and resources allocated to management of material impacts

No severe human rights issues or incidents connected to our upstream and downstream value chain have been brought to our attention. No specific resources have been allocated to the management of material impacts.

7.7. Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities S2-5

Kitron has not set targets related to managing material negative impacts, advancing positive impacts, or managing material risks and opportunities. Consequently, we have not engaged with value chain workers, their legitimate representatives, or credible proxies on this matter.

8. G1 Governance

8.1. Material impacts, risks and opportunities and their interaction with strategy and business model ESRS2 SBBM-3

Kitron has identified corruption and bribery as a material negative and potential impact as a result of our materiality analysis. Corruption and bribery can occur within Kitron's supply chain, and impact negatively through economic inequality, undermine local governments, and weaken socio-economic development in the region where we operate.

A risk to Kitron is that employees fail to follow our ethical standards, which include the prohibition of corruption and bribery. This can lead to reputational damage in relation to Kitron's business conduct. Another risk identified through our materiality analysis is if Kitron employees bribed a public official, as this could lead to fines or loss of permits to operate in some jurisdictions.

There are no significant effects unless the identified risks materialise. However, Kitron plans to make some changes to its procedures for the prevention and detection of corruption and bribery.

There are no cases of material risks that currently influence Kitron's financial position, financial performance, or cash flows. Additionally, there are no material risks or opportunities that pose a significant risk of a material adjustment within the next annual reporting period to the carrying amounts of assets and liabilities reported in the related financial statements.

Kitron does not anticipate any large financial effects on its financial position, financial performance, or cash flows over the short-, medium-, and long-term due to its material risks and opportunities. Given its strategy to manage risks and opportunities, Kitron does not expect significant changes in its financial position, financial performance, or cash flows over these time horizons. Furthermore, Kitron does not have any substantial investment plans, major acquisitions, divestments, joint ventures, business transformations, innovations, new business areas, or asset retirements planned. There are also no planned sources of funding to implement its strategy that would significantly impact its financial outlook.

8.2. Policies in place to manage its material impacts, risks and opportunities related to business conduct and corporate culture [MDR-P] G1-1

Kitron has three policies that are in place to manage material impacts, risks and opportunities related to business conduct and corporate culture, namely:

- Kitron's Ethical Code of Conduct (See S1)
- Kitron's Supplier Code of Conduct (See S2)
- Kitron's Anti-Corruption Policy

Our Anti-Corruption policy outlines our commitment to preventing corruption in our business activities. The policy includes the ethical standards and legal requirements that employees must adhere to, the roles and responsibilities of the Ethical Committee and Corporate Management Team (CMT), risk analysis and monitoring procedures, types of corruption, relationships with suppliers and other counterparties, transaction and record-keeping requirements, and training protocols.

The policy applies to all Kitron employees and individuals working for Kitron. It covers various aspects of corruption, including bribery of public officials, public sector bribery, and facilitation payments. The policy excludes facilitation payments only in situations where there is a serious medical or safety emergency, requiring approval from a manager or the Ethical Committee.

The most senior level accountable for the implementation of the policy is the CMT, which reports to the Board of Directors. The head of the Ethical Committee, which reports to the CMT, is also responsible for drafting reports on corruption risks and recommended actions.

The policy does not adhere to specific Third-Party Standards or Initiatives through the implementation of the policy, however the policy refers to Kitron's Ethical Code of Conduct which obliges Kitron and our employees to ethical business practices.

The policy considers interests of key stakeholders such as employees and individuals working for Kitron. In addition, the policy considers relationships with suppliers, intermediaries, partners and other counterparties.

The Anti-Corruption Policy is available online on Kitron's website to all, including potentially affected stakeholders.

How Kitron establishes, develops, promotes and evaluates corporate culture

All new Kitron employees shall go through ethical guidelines at onboarding in Kitron academy. This training is repeated every other year. Kitron has established a leadership program to promote and develop Kitron values and leadership values. In the annual performance review, the employee and the leader discuss the adherence to the leadership values which also contributes to the development of our corporate culture and where input from employees are used to evaluate corporate culture. Kitron conducts an annual employee survey which is used as input to evaluate our corporate culture.

Mechanisms for identifying, reporting and investigating concerns about unlawful behaviour

Kitron has implemented a whistleblowing procedure for reporting of unlawful behaviour or behaviour in contradiction of its code of conduct or similar internal rules but several reporting ways are possible. The whistleblowing channel is open to both internal and external stakeholders. Concerns reported through these channels are investigated thoroughly. The process for investigations is outlined in our routines for whistleblowing. The investigation process includes gathering relevant information and interviewing involved parties.

Consistency of Kitron's Anti-Corruption Policy with United Nations Convention against Corruption

While Kitron has an Anti-Corruption Policy in place, it has not been verified for alignment with the United Nations Convention against Corruption and there are currently no plans to make adjustments to the policy for this purpose.

Safeguards for reporting irregularities including whistleblowing protection

Kitron has established robust mechanisms to protect whistleblowers, ensuring that ethical issues or potential breaches of laws are reported and addressed appropriately. The following details outline the internal whistleblower reporting channels and measures to protect against retaliation:

Kitron has set up comprehensive internal whistleblower reporting channels to facilitate the reporting of ethical concerns and potential legal breaches. Employees are encouraged to report any concerns to their immediate superior or the superior's superior. Alternatively, they can report to an employee representative. For specific issues, such as environmental matters or workplace safety, reports can be directed to the relevant representative, HSE-manager, or the company health service. Financial matters may be reported to the Finance Manager.

Each Kitron site has designated contact persons for reporting concerns, including the Managing Director, HR Manager, and the main employee representative (collectively referred to as the "Reporting Contact"). If employees do not receive an appropriate response or feel uncomfortable reporting through these channels, they can escalate the report to the Reporting Contact.

Employees have the option to report directly to the Chairman of the Group Ethics Committee, the Chief HR Officer (CHRO) via email, or the Chairman of the Audit Committee for Kitron ASA. This ensures that employees have multiple avenues to report concerns. Kitron allows for anonymous reporting, although open reporting is encouraged to facilitate a more expedient resolution of the matter. All reports, whether anonymous or not, are taken seriously and handled with confidentiality.

All Kitron personnel are required to attend periodic training on the Ethical Code of Conduct, which includes detailed information on how to report irregularities and concerns. This training ensures that employees are well-informed about the reporting channels and procedures.

Kitron has implemented measures to protect whistleblowers from retaliation. This entails that Kitron strictly prohibits any form of retaliation against individuals who report ethical or legal concerns in good faith both in our Ethical Code of Conduct and in our Procedure for Whistleblowing. This protection is extended even if the report does not result in an actual violation. Kitron's commitment to non-retaliation ensures that employees can report concerns without fear of adverse consequences. When a report of irregularities or concern is received we pay particular attention to that the whistleblower is not subject to unfair treatment when it comes to work tasks, involvement in different processes, determination of wages and working conditions. Furthermore, we pay particular attention to that the whistleblower is not bullied, freezed out or harassed or accused of being the whistleblower.

Investigation of business conduct incidents

Kitron has furthermore established procedures to investigate business conduct incidents, including incidents of corruption and bribery, promptly, independently, and objectively. These procedures are detailed in the Whistleblowing Routines, which provides clear guidelines to ensure consistency and fairness throughout the investigation process. Kitron has no procedures to investigate business conduct incidents other than our Whistleblowing Routine.

Policy for training within organisation on business conduct

Kitron has no formal policy for training within the organisation on business conduct. However, all new Kitron employees are required to go through ethical guidelines training during their onboarding at the Kitron Academy. This training offers a detailed walkthrough of the ethical guidelines. This training is repeated every other year to ensure continuous adherence to ethical standards. Additionally, Kitron has established a leadership program to promote Kitron's values and leadership principles for all leaders with personnel responsibility, ensuring that these values are consistently upheld throughout the organisation. Leadership with personnel responsibility is the target audience for the leadership program.

Functions that are most at risk in respect of corruption and bribery

The functions most at risk in respect of corruption and bribery within Kitron include employees within sales, sourcing, and finance, as well as those in leadership positions. These roles are particularly exposed to potential ethical challenges and therefore require stringent adherence to the company's anti-corruption policies and regular training to mitigate risks.

8.3. Management of relationships with suppliers G1-2

Policy to prevent late payments, especially to SMEs

Kitron's general policy is that debt should be paid when it is due, this includes SMEs. In the monthly report discussed with the CMT, outstanding payments are visualised and explained. We follow up on late supplier payments in every financial reporting to the Board.

Relationship with suppliers and how social and environmental criteria are taken into account for selection of Kitron's contractual partners

At Kitron, we use the highest standards in the selection of our suppliers. Our main promise to any customer is that we want to be their long-term, sustainable partner. While the products and services we deliver are required to meet the highest quality requirements, we are fully committed to sustainable development, and we expect the same from our suppliers. Kitron's goal is to minimise negative environmental and social impacts from our supply chain. We expect our suppliers to adhere to all applicable laws and regulations, and to the highest ethical standards defined in the Ethical Code of Conduct and Supplier Code of Conduct. Our Supplier Code of Conduct is an integrated part of the commercial contract with suppliers.

Conflict mineral compliance is also an integral part of our Supplier Code of Conduct, and we expect our suppliers to have policies to ensure that tantalum, tin, tungsten and gold don't directly or indirectly finance, or benefit armed groups that are perpetrating serious breaches of human rights. Suppliers should exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available on request. Kitron is subject to legislations related to conflict minerals such as the Dodd-Frank Act, and we work to promote traceability of these minerals and of the supply chain in general.

New suppliers undergo a rigorous onboarding process, including a Request for Information (RFI) and supply chain and technical operational procedures define the supplier and manufacturer risk assessment to be performed. For conflict minerals technical data sheets related to content of minerals are reviewed as a part of the risk assessment and to identify conflict minerals. All records of conflict minerals reports are maintained in our ERP system to enable compliance status on product level. Existing suppliers are regularly assessed using a supplier scorecard and risk assessment, and those identified as high-risk are subject to audits and follow-up actions to ensure compliance with Kitron's standards. This supplier process also ensures that social and environmental criteria are taken into account.

All suppliers are to be evaluated on Kitron's requirements before onboarding to ensure that new suppliers meet requirements in Kitron's quality system related to conflict minerals, restriction of hazardous substances, registration, evaluation, authorization and restriction of chemicals. We also perform risk assessments yearly for all suppliers to verify that they continue to meet Kitron's requirements, including environmental and social requirements. If suppliers don't meet requirements we perform supplier audits and write a development plan.

8.4. Prevention and detection of corruption and bribery G1-3

Kitron is committed to maintaining high standards of integrity and ethical conduct in all our business activities. As part of this commitment, Kitron has established an Anti-corruption Policy which is available at our website. As outlined in our policy we regularly assess exposure to external and internal risk of corruption, this is how we reduce our overall exposure to corruption-related risks. Based on this risk assessment the head of the Ethical Committee drafts a report, with input from the business, to be submitted to the Kitron CMT and the Board. The report includes a description of identified corruption risks faced and recommendations to mitigate each identified risk. In addition to this general risk assessment, we have implemented controls, such as follow-up of action lists from corruption risk assessment, review of due diligence reports of counterparts, review of training log and review of internal transactions. Kitron has procedures in place for segregation of duties regarding outgoing payments and a "two eyes" requirement for changes to supplier payment details.

All of these elements are in place to prevent, detect and address allegations or incidents of corruption and bribery. Potential allegations of fraud or incidents of corruption or bribery are handled by The Ethics Committee.

Procedures to prevent, detect, and address allegations or incidents of corruption or bribery

Currently, the investigators or investigating committee are not separate from the chain of management involved in the prevention and detection of corruption or bribery and there is no established process for reporting outcomes of investigations to CMT and Board. However, we are committed to improving our efforts in the prevention and detection of corruption and bribery within the next two years. To accurately address this issue, we plan to seek external advice and implement appropriate procedures.

Our Anti-Corruption policy is communicated through training and is additionally easily accessible online on Kitron's website. Kitron has made no distinction based on who the policies are particularly relevant for, as a consequence there is no specific training for specific groups.

Training programs on anti-corruption and anti-bribery

Kitron ensures that all employees including management receive periodic training in our ethical guidelines, which includes anti-corruption training and anti-bribery training, to understand and implement the company's ethical values and policies. All new Kitron employees go through ethical guidelines onboarding in Kitron Academy. This training offers a detailed walkthrough of the ethical guidelines. The training in our Ethical Code of Conduct is repeated every other year for all employees. Additionally, Kitron has established a leadership program to promote Kitron values and leadership values, which includes our ethical commitment. While the Kitron Board does not participate in the training sessions, they are required to acknowledge that they have read and understood the Kitron Ethical Guidelines by signing a declaration.

Employees in high-risk roles, such as sourcing and procurement, undergo in-depth training to address specific corruption risks. These training programs are regularly updated to keep all personnel informed of the latest anti[1] corruption practices and standards. Kitron has not identified specific functions-at-risk beyond employees in sourcing and procurement. 92.5% of 80 in high risk positions have completed their training. Within the next two years we will identify these functions and monitor coverage in our training programs.

8.5. Incidents of corruption or bribery G1-4

Kitron has had no convictions or fines for violations of anti-corruption and anti-bribery laws during the reporting period. No specific action plans or resources have been allocated to address breaches in procedures related to corruption and bribery.

9. Appendix

9.1. List of datapoints in cross-cutting and topical standards that derive from other EU legislation ESRS 2 IRO-2

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material (Y) / not material (N)	Page nr. in report*
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816 (27) , Annex II		Y	7
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II		Y	5
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator number 10 Table #3 of Annex 1				Y	10
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Indicators number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 (28) Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Delegated Regulation (EU) 2020/1816, Annex II		N	
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator number 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		N	
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818 (29) , Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		N	
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		N	
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	N	

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material (Y) / not material (N)	Page nr. in report*
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article12.1 (d) to (g), and Article 12.2		N	
ESRS E1-4 GHG emission reduction targets paragraph 34	Indicator number 4 Table #2 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		N	
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1				Y	
ESRS E1-5 Energy consumption and mix paragraph 37	Indicator number 5 Table #1 of Annex 1				Y	33
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Indicator number 6 Table #1 of Annex 1				Y	33
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		Y	34
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Indicators number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		Y	34
ESRS E1-7 GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	N	

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material (Y) / not material (N)	Page nr. in report*
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		N	
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk.			N	
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34;Template 2:Banking book -Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral			N	
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		N	
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1				N	
ESRS E3-1 Water and marine resources paragraph 9	Indicator number 7 Table #2 of Annex 1				N	
ESRS E3-1 Dedicated policy paragraph 13	Indicator number 8 Table 2 of Annex 1				N	
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator number 12 Table #2 of Annex 1				N	
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator number 6.2 Table #2 of Annex 1				N	
ESRS E3-4: Total water consumption in m 3 per net revenue on own operations paragraph 29	Indicator number 6.1 Table #2 of Annex 1				N	

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material (Y) / not material (N)	Page nr. in report*
ESRS 2- SBM 3 - E4 paragraph 16 (a) i	Indicator number 7 Table #1 of Annex 1				N	
ESRS 2- SBM 3 - E4 paragraph 16 (b)	Indicator number 10 Table #2 of Annex 1				N	
ESRS 2- SBM 3 - E4 paragraph 16 (c)	Indicator number 14 Table #2 of Annex 1				N	
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Indicator number 11 Table #2 of Annex 1				N	
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Indicator number 12 Table #2 of Annex 1				N	
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Indicator number 15 Table #2 of Annex 1				N	
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Indicator number 13 Table #2 of Annex 1				Y	46
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Indicator number 9 Table #1 of Annex 1				Y	46
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)	Indicator number 13 Table #3 of Annex I				Y	49
ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)	Indicator number 12 Table #3 of Annex I				Y	49
ESRS S1-1 Human rights policy commitments paragraph 20	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I				Y	52
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II		Y	52
ESRS S1-1 Processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 Table #3 of Annex I				Y	52
ESRS S1-1 Workplace accident prevention policy or management system paragraph 23	Indicator number 1 Table #3 of Annex I				Y	52

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material (Y) / not material (N)	Page nr. in report*
ESRS S1-3 Grievance/ complaints handling mechanisms paragraph 32 (c)	Indicator number 5 Table #3 of Annex I				Y	56
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Y	62
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicator number 3 Table #3 of Annex I				N	
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		N	
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8 Table #3 of Annex I				N	
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	Indicator number 7 Table #3 of Annex I				Y	63
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD Guidelines paragraph 104 (a)	Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)		Y	63
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Indicators number 12 and n. 13 Table #3 of Annex I				Y	66
ESRS S2-1 Human rights policy commitments paragraph 17	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1				Y	67
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicator number 11 and n. 4 Table #3 of Annex 1				Y	67
ESRS S2-1Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Y	67
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II		Y	67

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material (Y) / not material (N)	Page nr. in report*
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicator number 14 Table #3 of Annex 1				N	
ESRS S3-1 Human rights policy commitments paragraph 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1				N	
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines paragraph 17	Indicator number 10 Table #1 Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		N	
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14 Table #3 of Annex 1				N	
ESRS S4-1 Policies related to consumers and end-users paragraph 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				N	
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		N	
ESRS S4-4 Human rights issues and incidents paragraph 35	Indicator number 14 Table #3 of Annex 1				N	
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Indicator number 15 Table #3 of Annex 1				Y	74
ESRS G1-1 Protection of whistle- blowers paragraph 10 (d)	Indicator number 6 Table #3 of Annex 1				Y	74
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	Indicator number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II)		Y	80
ESRS G1-4 Standards of anti- corruption and anti- bribery paragraph 24 (b)						

9.2. Thresholds used to determine impact materiality IRO-2

Severity	Likelihood	Material for reporting	Score	Watch-list
1	1	No	LOW	-
2	1	No	LOW	-
3	1	No	MEDIUM	-
4	1	No	MEDIUM	-
5	1	Yes	HIGH	-
1	2	No	LOW	-
2	2	No	LOW	-
3	2	No	MEDIUM	-
4	2	Yes	HIGH	-
5	2	Yes	HIGH	-
1	3	No	LOW	-
2	3	No	MEDIUM	-
3	3	No	MEDIUM	-
4	3	Yes	HIGH	-
5	3	Yes	HIGH	-
1	4	No	MEDIUM	-
2	4	No	MEDIUM	-
3	4	Yes	HIGH	-
4	4	Yes	HIGH	-
5	4	Yes	HIGH	-
1	5	No	MEDIUM	-
2	5	Yes	HIGH	-
3	5	Yes	HIGH	-
4	5	Yes	HIGH	-
5	5	Yes	HIGH	-

9.3. Thresholds used to determine financial materiality IRO-2

Magnitude	Likelihood	Material for reporting	Score
1	1	No	LOW
2	1	No	LOW
3	1	No	MEDIUM
4	1	No	MEDIUM
5	1	Yes	HIGH
1	2	No	LOW
2	2	No	LOW
3	2	No	MEDIUM
4	2	Yes	HIGH
5	2	Yes	HIGH
1	3	No	LOW
2	3	No	MEDIUM
3	3	No	MEDIUM
4	3	Yes	HIGH
5	3	Yes	HIGH
1	4	No	MEDIUM
2	4	No	MEDIUM
3	4	Yes	HIGH
4	4	Yes	HIGH
5	4	Yes	HIGH
1	5	No	MEDIUM
2	5	Yes	HIGH
3	5	Yes	HIGH
4	5	Yes	HIGH
5	5	Yes	HIGH