

# HUMAN RIGHTS AND TRANSPARENCY



HUMAN RIGHTS AND  
TRANSPARENCY ACT REPORT

**2024**

# 1. Introduction

## 1.1. About the Transparency Act

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

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

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

## 1.2. About the Report

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

The report covers the period from 1. January to 31. December 2024.

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

This report was approved by the Group Board of Directors in Kitron ASA on 30.06.2025 and the Board of Directors in Kitron AS on 30.06.2025.

## 1.3. Contact information

For further information about Kitron ASA and Kitron AS work on human rights and decent working conditions, please contact [info@kitron.com](mailto:info@kitron.com).

## 2. About Kitron

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

Established in the early 1960s, the company has grown to become a leading Scandinavian Electronics Manufacturing Services (EMS) company producing electronics with a revenue of 647 million in 2024. Kitron manufactures and delivers anything from fully assembled electronic circuit boards to complete end products for customers globally. Kitron also offers related technical services such as prototyping, industrialization, material analysis, and test development, which are key competencies of the company.

Headquartered in Billingstad, Norway, Kitron Group employs approximately 2400 people worldwide, with

operations in Norway, Sweden, Denmark, Lithuania, Germany, Poland, the Czech Republic, India, China, Malaysia and the United States. Kitron AS employs approximately 500 employees of the total 2400 people working at Kitron and has their operations in Arendal.

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





# 3. Our approach to human rights

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

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

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

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

We have detailed below how we work on the different steps in OECDs due diligence model.



### 3.1. Embed responsible business conduct into policies and management systems

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

- Ethical Code of Conduct
- Supplier Code of Conduct
- Whistleblowing policy
- Responsible Sales Policy

All documents are made publicly available through Kitron's website: <https://kitron.com/about-kitron#ethical-guidelines>.

#### 3.1.1. Ethical Code of Conduct

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

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

#### 3.1.2. Supplier Code of Conduct

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

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

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

### 3.1.3. Supplier management

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

Kitron AS is ISO 9001 certified and hence the supplier management process is annually subject to multiple second and third-party audits.

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

### 3.1.4. Whistleblowing procedures

All conditions that give rise to ethical issues or matters that could involve a breach of laws and which may cause legal liability, loss of value or reputation for Kitron should be reported. Kitron's staff has an obligation to report any criminal acts, harassment, discrimination, or circumstances where life or health

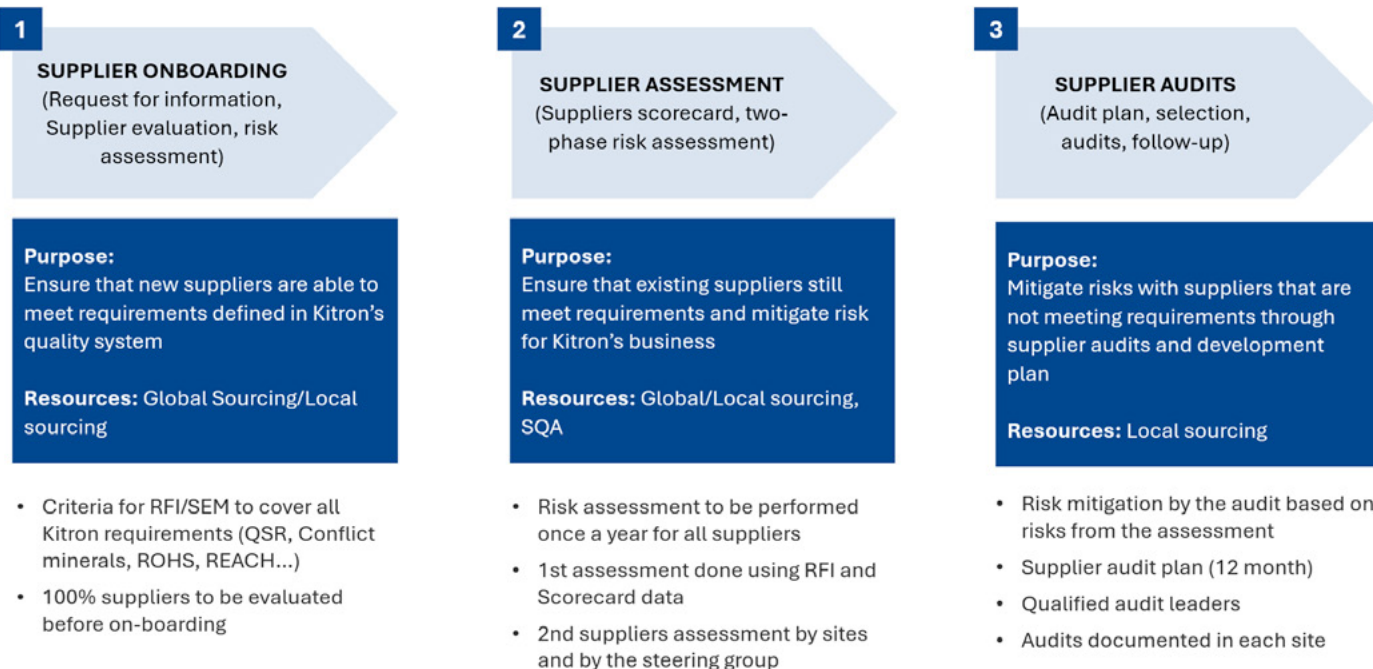
might be in danger. For external parties, a report can be sent directly to the Chairman of the Group Ethics Committee, here: [whistleblowing@kitron.com](mailto:whistleblowing@kitron.com).

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

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

### 3.1.5. Responsible Sales Policy

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



### 3.2. Identify and assess adverse impacts

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

#### Own workforce

Kitron has identified working conditions and health and safety as areas with significant inherent risks related to our workforce. This is due to operating in countries where the inherent risks of adverse impacts are generally considered high. The inherent geographic risks are significantly lower for Norway and Kitron AS; however, there is an intrinsic workplace risk here as well. Kitron also experiences fluctuations in customer demand, which can lead to unintended negative impacts on working conditions, particularly for vulnerable groups. There is an intrinsic workplace risk, especially on the production floor, for accidents and injuries, which could negatively impact our workforce.

While these areas are identified as having significant inherent risks, our due diligence process has assessed the actual risk of adverse impacts as low. As outlined in our Code of Conduct, we follow local and international norms and relevant legislation in all Kitron entities to ensure fair employment practices and a safe, healthy, and satisfactory workplace. We rely on a highly skilled workforce, making it necessary to provide working conditions and benefits that attract and retain workers. We actively engage with our workforce through employee representatives, employee surveys, and informal channels. We put significant effort into maintaining high health and safety standards, resulting in very few incidents, primarily minor injuries, and no fatalities across

Kitron sites. We provide regular training to employees on health and safety, supply protective gear to all employees, and several of our sites are ISO-certified for health and safety. These efforts combined lead us to assess the risk as low; however, we recognize that risks to our workers can evolve. We will continue to identify and assess potential adverse impacts on our workforce moving forward. Our work to prevent and mitigate potential adverse impacts is described in more detail in 3.3.

#### Value Chain

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

While we strive to use the highest standards in the selection of our suppliers and have measures to mitigate risks to people throughout our value chain (as described in more detail under section 3.3), our due diligence process has assessed the potential risk areas as medium to high. This assessment is due to limited transparency and traceability in complex supply chains, known risks in the electronics manufacturing supply chain, and procurement from regions with high inherent human rights risks.

#### Business partners

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

Kitron has not identified any actual negative impacts we have caused or contributed to in 2024.



### 3.3. Cease, prevent or mitigate adverse impacts

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

#### Own workforce

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

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

#### Supply chain

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

- Annual due diligence process of risks associated with our supply chain. This increases the awareness in relevant functions of risks and provides the basis for the upcoming year.
- Supplier selection standards including requesting information from new suppliers, signing of the supplier code of conducts, and onboarding of suppliers to Kitrons preferred supplier program or supplier database.
- Expectations towards our suppliers to source minerals from responsible sources and exercise due diligence towards their sub suppliers to be compliant to the Electronic Industry Citizenship Coalition.
- Several audits have been conducted in 2024 where questions relating to social standards were included, however, we see a need to incorporate human rights and social condition into audits to a greater extent this is described in more detail below
- It is important to note that production is according to our customers specifications, this also entails that Kitron is not always at liberty to source material that are manufactured by any manufacturer other than the ones that are directly approved by our customers.

#### Downstream

We have identified a risk associated with business partners in the defense and aerospace sector. To mitigate this risk we:

- Ensure compliance with applicable laws, regulations and internal requirements as part of our corporate governance system. This includes strict compliance with export regulations and sanctions.
- Kitron AS has a defined process for screening of customers towards sanctions lists.
- Strive to work only with reputable business partners known for their integrity, whose conduct consistently meets our standards as outlined in our Code of Conduct.
- Work exclusively with customers in NATO countries and NATO allied countries.



### Planned initiatives and measures for 2025

Kitron has initiatives and measures planned for 2025 to prevent and mitigate risks both in our workforce, in our supply chain and with our business partners. This includes:

- Closely monitoring working conditions as a result of fluctuations in demand to ensure decent working conditions for our workforce.
- Developing and implementing a group policy for Health, Safety and Environment Policy across the Kitron Group. This will contribute to the continuous improvement of our work on health and safety for our workforce.
- Improving our established processes for supplier risk management to enable us to include risk to people to a greater extent than today. Our goal is that this will contribute to identify suppliers with higher risks so that those can be followed up to a larger extent than today.
- Improved procedures for due diligence of existing suppliers in Kitron AS. The aim is to enhance risk identification and risk treatment within our existing supplier relationships.
- Incorporating human rights and social condition into supplier audits to a greater extent. This will enable us to identify potential adverse impacts and mitigate those.
- Continuously assessing the need to revise our procedures on responsible sales. The purpose is to ensure that our sales practices align with ethical standards and global developments.



### 3.4. Track implementation and results

We will continuously track implementation of the abovementioned ongoing and planned measures. The planned initiatives and measures for 2025 have been reviewed and approved by the board of directors in both Kitron AS and Kitron ASA, and will be communicated to Kitron's Corporate Executive Management, who is accountable for the Group's strategy, development, and daily operations and to Kitron AS leadership. Designated functions within Kitron ASA and Kitron AS will report on the progress of our due diligence work and measures to corporate executive management, who will monitor progress and report results to the board of directors in Kitron ASA and Kitron AS respectively at least annually as part of the due diligence assessment. Should there be a need to adjust plans or measures these will be continuously discussed by relevant functions and corporate management will be included on a need basis.

### 3.5. Communicate how impacts are addressed

This Human Rights and Transparency Act Report communicates how Kitron identifies and addresses human rights impacts in our operations, supply chains and with business partners. Kitron will regularly communicate about our progress through these reports, as well as through the company's annual sustainability reports.

Upon written request, any person also has the right to request information on how Kitron addresses actual and potential adverse impacts on fundamental human rights and decent working conditions. These requests can be sent to: [info@kitron.com](mailto:info@kitron.com).

It is important to note that the right to request information is subject to certain limitations. Specifically, information that is classified under the Security Act or protected by the Intellectual Property Right Act is exempt from disclosure. This to ensure that sensitive information, which could compromise security or proprietary interest, remains safeguarded while still upholding our commitment to transparency in other areas.

### 3.6. Provide for or cooperate in remediation when appropriate

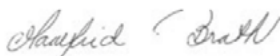
Kitron has not identified any actual negative impacts within our workforce or supply chain in 2024. Kitron will provide for or cooperate in remediation when appropriate.

This report was approved on 30 June 2025 by the CEO and Board of Directors of Kitron ASA, the parent company of the Kitron Group.

Oslo, 30 June 2025



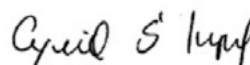
**Tuomo Lähdesmäki**  
Chairman



**Maalfrid Brath**  
Deputy Chairman



**Michael Lundgaard Thomsen**  
Board Member



**Gyrid Skalleberg Inger**  
Board Member



**Petra Grandinson**  
Board Member



**Ingjerd Livollen**  
Employee Elected  
Board Member



**Håkon Ljøstad**  
Employee Elected  
Board Member



**Geir Vedøy**  
Employee Elected  
Board Member



**Peter Nilsson**  
CEO of Kitron ASA

This report was approved on 30 June 2025 by the CEO and Board of Directors of Kitron AS, a subsidiary of Kitron ASA.

Oslo, 30 June 2025



**Hans Petter Thomassen**  
Chairman



**Mona Cathrin Nylander**  
Board Member



**Henning Dahlen**  
Board Member



**Rune M. Andersen**  
Employee Elected  
Board Member (Alternate)



**Vidar Hushovd**  
Employee Elected  
Board Member



**Geir Henriksen**  
CEO of Kitron AS



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

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

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

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



[www.kitron.com](http://www.kitron.com)