



HUMAN RIGHTS IN KONGSBERG AUTOMOTIVE



KONGSBERG
AUTOMOTIVE



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Kongsberg Automotive ("KA") endorses human and labor rights and is committed to ensuring healthy, decent, and safe working conditions. This statement sets out the commitment and measures KA has taken during the financial year 2025 to ensure that human and labor rights are respected in all parts of its business and the supply chain.

This report is prepared in accordance with the Norwegian Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions of June 18, 2021 ("Transparency Act") section 5. KA further strives to promote and facilitate transparency under, but not limited to, the United Nations (UN) Guiding Principles on Business and Human Rights (UNGPs), the UN Universal Declaration of Human Rights, the Core Conventions of the International Labour Organization (ILO), and the ILO Declaration on Fundamental Principles and Rights at Work, as well as other recent examples of anti-forced labour initiatives such as the United States' Uyghur Forced Labour Prevention Act ("UFLPA"), the United Kingdom's 2015 Modern Slavery Act, the European Union's deforestation regulation, the Regulation (EU) 2024/3015 prohibiting products made with forced labour from being sold on the Union market and the European Union's Corporate Sustainability Due Diligence Directive ("CSDDD"). Although KA is not directly subject to the German Supply Chain Act ("LkSG"), this report also serves as reference for KA's customers and suppliers who are subject to the obligations contained therein.

ABOUT KONGSBERG AUTOMOTIVE

The Kongsberg Automotive group is a global supplier to the international vehicle industry and also to some other applications, founded in Norway in 1987. The company is headquartered in Kongsberg, Norway, and is listed on the Oslo Stock Exchange. KA operates in 17 countries and employs ~ 4,300 FTEs. Its 2025 revenues amount to 713 M€. KA has two business areas, namely Drive Control Systems (producing pneumatic and electric actuation systems for gear control and clutch actuation, steering column modules, pedals and throttles for off-highway applications) and Flow Control Systems (producing couplings and pipes for air management circuits, systems for powertrain fluid management, thermal management systems for ICE and BEV). The group operates 21 plants and 5 technical centers. The plants are located in Norway, Sweden, UK, France, Spain, Poland, Slovakia, India, China, South Korea, Canada, USA, Mexico and Brazil. Kongsberg Automotive ASA, the ultimate mother company, runs the three facilities in Norway. The other plants, facilities and offices are being run by subsidiaries incorporated in the respective country. The Kongsberg Automotive group of companies generates 49% of its revenues in Europe, 36% in North America, 11% in Asia-Pacific, 4% in South America. It supplies to the automotive industry (OEMs, Tier1 and aftermarket) and to non-automotive industries such as agriculture, construction and industrial areas.



KA'S PRINCIPLES ON HUMAN RIGHTS AND WORKING CONDITIONS - GUIDELINES AND PROCEDURES FOR HANDLING ACTUAL AND POTENTIAL ADVERSE IMPACT ON FUNDAMENTAL HUMAN RIGHTS AND DECENT WORKING CONDITIONS

Since 2008, compliance with human rights and working conditions has been addressed in Kongsberg Automotive's Code of Conduct ("CoC"). This requirement has been further developed in later revisions of the CoC, the latest in 2025, that requires respect for human rights and specifically addresses, inter alia, the following principles:

- Non-discrimination and equal opportunities
- Non-tolerance for harassment
- Respect for other people
- Safe workplace – Health Safety & Environment
- Protection of personal information
- Non-tolerance of child labor and forced labor
- Freedom of association
- Protection of the environment
- Non-tolerance of any form of bribery or corrupt practices
- Free and fair competition

The Code of Conduct training is an integral part of the onboarding process for new employees and board members. To ensure a consistent and constant update for all KA employees, the company rolled out a new procedure in Q4 2025 to provide accurate information on training completion status.

KA respects the right to collective bargaining and association – by the end of 2025, 63% of the employees were covered by collective bargaining agreements. Most KA employees work in countries where this topic is also locally regulated under labor rights. KA's Incident Rate (per million hours worked) for the direct workforce in 2025 was 0.99.

Locations worldwide have implemented Human Resources (HR) policies and practices concerning human and labour rights. Furthermore, all KA locations comply with local legislation that respects the guidelines of the International Labor Organization (ILO).

Additionally, through i.a.

- Continually improved and formally certified health and safety management systems
- Transparent recruitment, career management and remuneration systems and processes
- Yearly regular performance and career management review and
- Training and development opportunities

KA not only strives to provide safe and healthy working conditions but also seeks to contribute to the well-being of its employees.

Discrimination and harassment are not tolerated. KA is committed to providing equal opportunities to all employees. KA is committed to equal pay for equal work. The overall ratio of average remuneration of women to men was 70% at the end of 2025. This primarily reflects differences in role distribution and seniority levels rather than unequal pay for comparable roles.

- KA applies the same standards for working conditions in all its plants worldwide, also considering that the policies are issued on a global level and apply to all locations of KA. Local adaptations comply with the applicable country laws. KA has a communication channel -



SpeakUp® - operated by a third-party allowing anyone (both internal, such as employees, and external, such as suppliers, customers, stakeholders) to report incidents, breaches or suspected breaches of KA's Code of Conduct, or policies and regulations, corruption, including bribes and facilitation payments, human and labor rights violations, discrimination or harassment, misuse of insider information, fraud, theft and/or embezzlement via phone or web in any language spoken at the KA locations. Anonymous reporting and subsequent communication are made possible. This whistleblowing tool is routinely audited and accredited by global privacy and security standards. These standards are relevant to regulations like the EU Whistleblowing Directive. All reported concerns are received by KA's General Counsel and EVP HR. The General Counsel is responsible for ensuring that grievances are investigated using the appropriate means, e.g. internal resources from Finance, Legal, or HR, or retained external resources. The General Counsel provides quarterly reports to the CEO of all ongoing and closed matters concerning potential Code of Conduct violations. Significant and serious matters are reported to the Board of Directors. KA's Code of Conduct outlines how individuals can report a concern via SpeakUp's® web or phone lines. The reports are treated with strict confidentiality. In 2025, KA received 37 reports through the platform and via other communication channels.

KA'S RESPONSIBLE SOURCING AND SUPPLY CHAIN MANAGEMENT

We refer to KA's Sustainability Statements contained in the published 2025 financial report of Kongsberg Automotive, with relevant extract to be retrieved at: _

https://www.kongsbergautomotive.com/globalassets/company/corporate-responsibility/reports/all-sustainability-reports/ka_annual_report-2025-sustainability.pdf

KA has 1,465 (2024: 1,475) direct material suppliers in 40 (38 in 2024) countries and 5,520 (5,588 in 2024) indirect suppliers in 44 (43 in 2024) countries. With the strategic aim to work with global and local suppliers and build a diverse supplier portfolio, in 2025, KA had a footprint of 493 (520 in 2024) direct material suppliers in the Americas, 309 (272 in 2024) suppliers in the Asia Pacific region, and 663 (683 in 2024) suppliers in Europe.

KA's strategic supplier portfolio aims to balance global and local suppliers across diverse business sizes, from micro to large enterprises. Local suppliers account for 88% of direct material purchase spend (88% in 2024) and 98% of indirect spend (97% in 2024). Through local purchasing, KA proudly contributes to regional economic development and employment while reducing environmental impact. Local suppliers are defined as those located in the same geographical region (the Americas, Europe, and Asia-Pacific). KA's medium- and long-term goal is to maintain these local sourcing percentages, supporting both regional development and global growth.

In 2025, approximately 7% of suppliers (271 direct material and 304 indirect suppliers) account for 80% of the annual purchasing spend.



Requirements towards suppliers

Human rights and decent working conditions throughout the supply chain are of utmost importance to KA. The sustainability team in KA's Purchasing department regularly evaluates the company's approach, conducts due diligence, and works towards expanding the company's approach.

KA works to identify relevant human and labour rights issues based on the applicable international and local regulations and guidelines, its corporate responsibility strategy, industry and customer requirements, and benchmark analyses.

KA focuses on the following human and labour rights when determining the requirements that the company puts on suppliers and while carrying out supplier risk assessments:

- Child labour and young workers
- Wages and benefits
- Working hours
- Modern slavery (i.e. slavery, servitude and forced or compulsory labor and human trafficking),
- Ethical recruiting
- Freedom of association and collective bargaining
- Non-discrimination and harassment
- Women's rights
- Diversity, equity, and inclusion
- Rights of minorities and indigenous peoples
- Land, forest and water rights and forced eviction
- Use of private or public security forces

Suppliers are required to adhere to the same high standards as KA applies on itself. The relevant principles and requirements for the supply chain are set out and communicated in KA's Supplier Declaration (with reference to the more detailed Supplier Sustainability Manual), which summarizes the most important environmental, social, and ethical requirements for suppliers and, in turn, their suppliers (see the specific topics below). These requirements were updated in 2024 to include new legal and industrial requirements and standards, especially regarding human and labor rights.

- human and labour rights (requiring the suppliers to set up policies and management systems to identify and effectively prevent, mitigate and escalate human and labour rights related risks, continual monitoring and transparent reporting on risk and breaches);
- ethical employment (safe and non-discriminatory work environment, upholding workers' rights to freedom of association and collective bargaining, fair wages, reasonable working hours, and prevention of any form of harassment or discrimination, respect and dignity for all employees);
- data privacy and cyber security;
- sustainability (action regarding climate change, extended minerals); and
- sustainable supply chain management (adopting policies and management systems to manage environmental, social and ethical risks, setting binding and ambitious sustainability requirements toward suppliers, increasing supplier diversity and inclusivity initiatives, social investments and improving local employment, economic and social development as well as wellbeing).

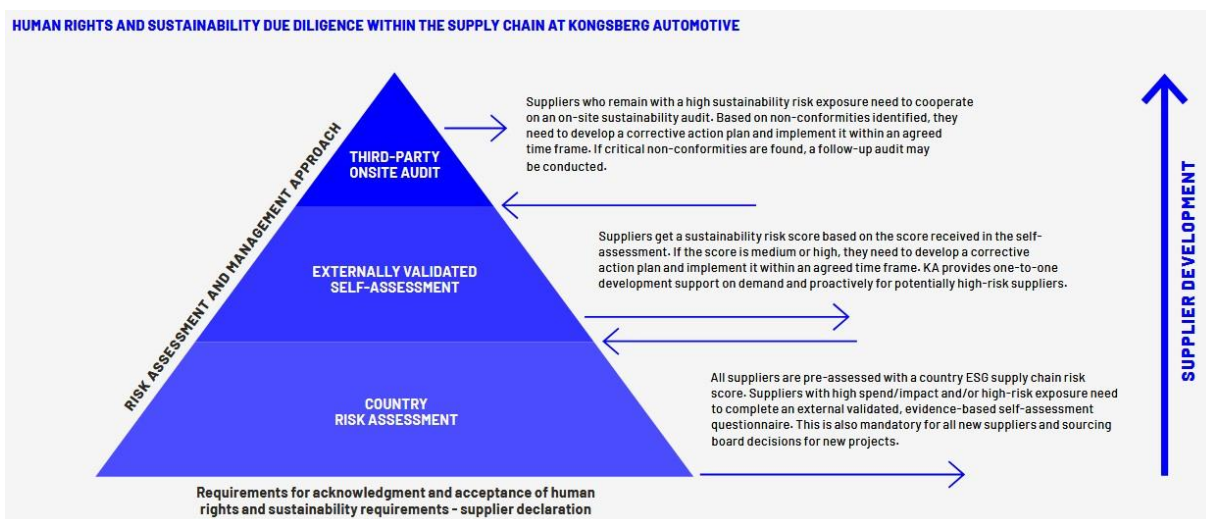


In 2025, 90% (2024: 86%) of direct material spend was with suppliers who have signed the Supplier Declaration. 10% (2024: 9%) of indirect material suppliers have signed the Declaration. KA is reviewing actions to increase the acceptance rate, with a target of achieving close to 100% acceptance. KA's responsible mineral sourcing efforts focus on metals supply chains, acknowledging the mining industry's inherent challenges and complex networks. The approach targets ten key minerals with the highest risk of adverse social and environmental impacts, operating through two strategic pillars: supply chain transparency, and industry and cross-industry partnership. In 2025 KA enlarged its due diligence scope and added copper, graphite, lithium and nickel to the already examined minerals tin, tungsten, tantalum, gold, cobalt and mica. A position statement on responsible minerals sourcing is published in the supplier section on www.kongsbergautomotive.com. KA has extended due diligence activities and conducts an annual data collection process for smelter validations. The response rate was 89% (90% in 2024) on CMRT and 65% on EMRT (68% in 2024). KA has identified smelter of concerns and continues to take measures to escalate and improve.

KA is member of the Responsible Mineral Initiative, which may offer further impactful measures for KA in future. In 2025, product-level reporting was not mandatory, as most companies were neither legally required to provide such disclosures, nor equipped with resources due to their average company sizes. Still, KA encourages suppliers to report on product level or user-defined scope if possible.

Supplier sustainability risk management

KA's supplier sustainability risk prevention and mitigation approach in the areas of human and labour rights, responsible employment, health and safety builds upon three levels:

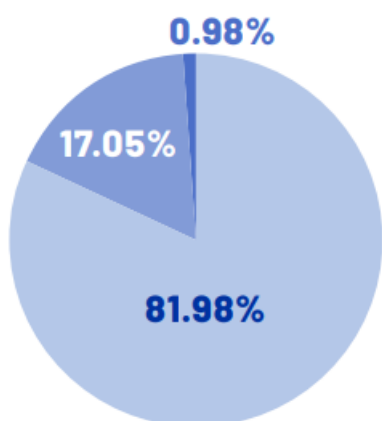


This approach provides KA with insights into risk exposures and enables it to prevent and effectively mitigate risks concerning human rights, the environment, and ethics.

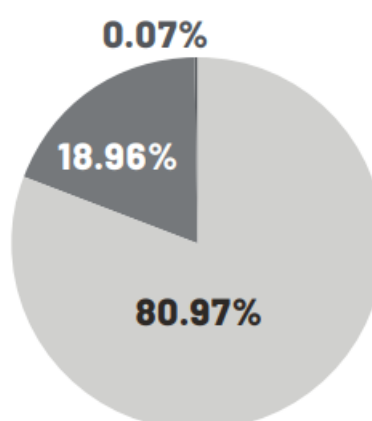
Country risk assessment. Most of KA's suppliers are located in low-risk countries (level A). Level B represents medium risk, and level C is high risk based on CountryRisk.io's ESG Supply Chain Risk Score. In case of suppliers in high-risk countries (level C, e.g. Turkey and Bosnia and Herzegovina in 2025), KA identifies the respective risks and takes steps to improve performance.



**DIRECT SUPPLIERS' COUNTRY RISK SCORE
BY SPEND**



**INDIRECT SUPPLIERS' COUNTRY RISK SCORE
BY SPEND**



LEVEL A (LOW RISK) LEVEL B (MEDIUM RISK) LEVEL C (HIGH RISK)

Assessment. KA requires direct material suppliers to report on their governance and management practices, with regard to environmental, social, and ethical issues, with a special focus on human rights, labor rights, and working conditions. KA expects its suppliers to have an effective policy and management system in place to identify and manage any material environmental, social, and ethical risk as well as their performance when it comes to offering training for their workforce on the relevant issues, and to communicate the necessary requirements to their own suppliers. This information is collected from suppliers through a standardized, evidence-based self-assessment questionnaire. The Sustainability Assessment Questionnaire (SAQ on the Supplier Assurance platform) has been developed and promoted by CSR Europe and Drive Sustainability, and is widely used in the automotive industry. KA also accepts alternative valid risk assessments of suppliers provided, if suppliers can demonstrate a sound methodology and that the report comprehensively covers all important topics, including the sharing of detailed assessment results (e.g. EcoVadis). This allows KA to identify risks resulting from gaps in suppliers' existing governance and management approaches, and to engage with suppliers on their performance.

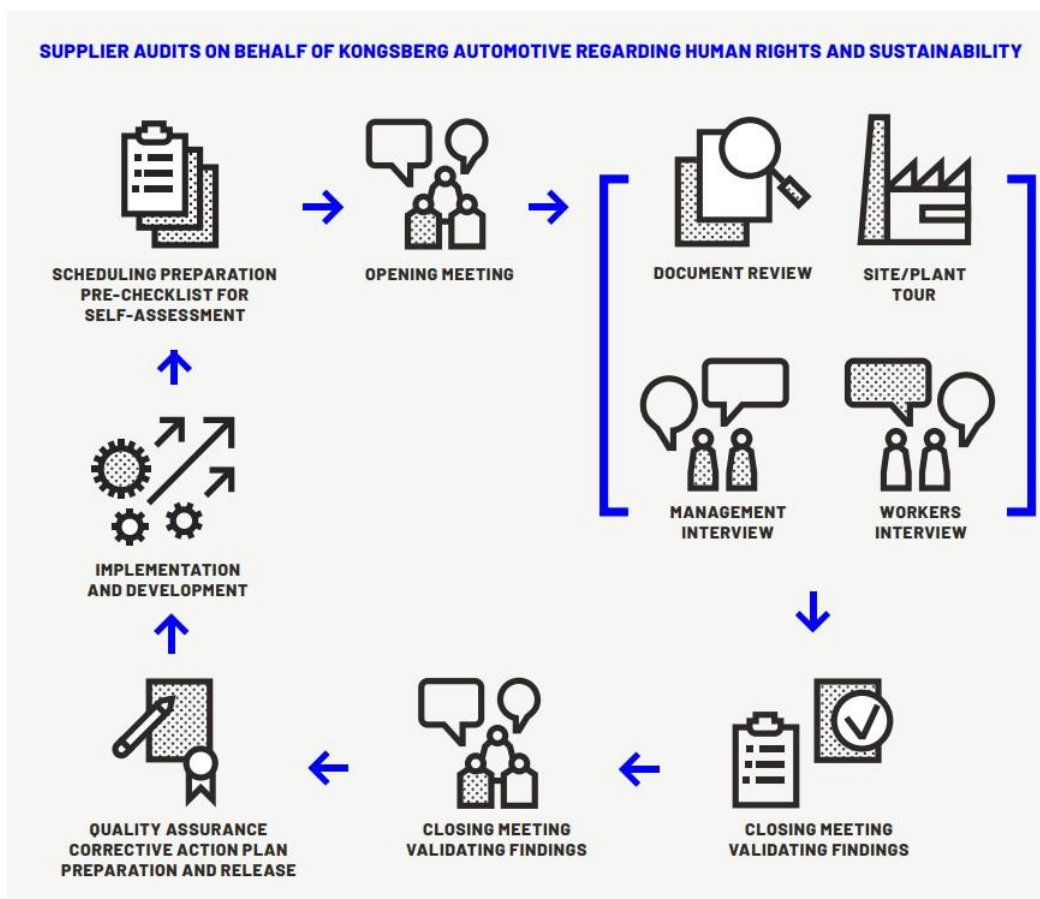
By the end of 2025, 469 suppliers, covering 90% (88% in 2024) of KA's yearly direct material purchasing spend, completed the questionnaire or provided an equivalent, valid sustainability risk assessment. The information and related evidence are validated by an independent third party. After assessing their questionnaires, all suppliers receive feedback and recommendations on how to improve their governance and management systems, which helps them in setting up effective plans for corrective action.

Suppliers whose assessment scores indicate a high sustainability risk receive further recommendations to develop an impactful corrective action plan. KA prioritizes suppliers with low sustainability risks, including those related to human rights. All suppliers whose assessment scores indicate medium-to-high risks are supported in their development. As KA's supplier sustainability program expands, the company aims to provide tailored support for suppliers as well as other training materials and events.



KA approaches its Tier 1 suppliers directly and regularly and expects them to roll down supplier sustainability requirements to their own suppliers.

On-site audits. Where appropriate, KA conducts third-party on-site sustainability audits to ensure effective implementation of sustainability-related management systems and performance in accordance with KA's requirements. The following diagram summarizes the process steps and topics. The audits also allow for the validation of self-assessment results and provide additional insights into risk assessment gaps. In 2025, KA commissioned five (2024: eight) on-site first audits and three online follow-up audits (2024: one), all conducted by a third party.



Channels to raise concerns. Potential violations of human rights and working conditions including environmental obligations by our direct and indirect suppliers as well as the areas of concern outlined above can also be reported to KA's SpeakUp system as described above. In 2025, no breaches were reported (2024:0).

Further, KA avails itself of a global media screening tool (RiskMethod) for its suppliers, their industries, and their geographical locations, triggering alerts for publicly identified human or labor rights issues. These alerts prompt immediate buyer notifications and initiate further investigation.



Training and development.

In 2025, KA's Sustainable Purchasing department delivered training to Purchasing staff worldwide, covering sustainable development, responsible and sustainable purchasing, and responsible minerals. Fifteen members of KA's Purchasing team participated in at least one live webinar training session in 2025. As a result, a 98,6% training coverage rate was achieved among Purchasing colleagues by year-end 2025 (2024: 96,7%).

Escalation measures towards suppliers

Selected suppliers (potential high risk or awarded for new business) that do not sign the Supplier Declaration or fail to undertake the external sustainability risk assessment are invited to a dialogue with KA purchasing colleagues to determine how the supplier can improve. KA seeks to replace suppliers that do not comply with the expected standards despite improvement measures. KA's purchasing function is working diligently to increase the response rates and performance of suppliers. A potential risk for incorrect or inaccurate reporting or ineffective implementation persists. KA intends to initiate additional on-site audits of selected suppliers, focusing on locations with high-risk potential and preferred suppliers with development needs.

In 2024 and 2025, no significant breaches or human rights impacts were identified, particularly regarding child or forced labor, therefore no remediation activities were needed.

Since the Norwegian Transparency Act entered into force on July 1, 2022 to date, KA has not experienced any significant failure to comply with its standards on human rights and decent working conditions in its own plants and facilities nor among its suppliers.

Access to information requests

As per section 6 of the Transparency Act, any person has the right to information from an enterprise regarding how the enterprise addresses actual or potential adverse impacts in accordance with the Act. This includes both general information and information relating to a specific product or service offered by the enterprise.

Such requests may be presented to sustainability@ka-group.com



Kongsberg, June 29, 2026

The Board of Directors and the President & CEO of Kongsberg Automotive ASA

Sign.
Olav Volldal
Chair

Sign.
Bård Klungseth
Deputy Chair

Sign.
Synnøve Gjønnnes
Director

Sign.
Ulla-Britt Fräjdin-Hellqvist
Director

Sign.
Bjørn Eldar Petersen
Director

Sign.
Hilde-Yvonne Beggerud
Director

Sign.
Ørjan Langnes
Director

Sign.
Siw Reidun Wærås Bjerke
Director

Sign.
Trond Fiskum
President & CEO