

## Zaptec Human Rights Policy

### Our commitment

At Zaptec we are deeply committed to upholding and supporting human rights. Our Human Rights policy and work is based on the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, the Transparency Act, and the Modern Slavery Act. Moreover, as a signatory of the UN Global Compact, we also pledge to promote and uphold the Ten Principles of the Global Compact, including those relating to human rights. In line with these commitments, Zaptec:

- Has a zero-tolerance approach to modern slavery and prohibits any form of child labor and modern slavery, such as slavery, forced and compulsory labor, and human trafficking.
- Does not tolerate harassment, discrimination, or inhumane treatment of any kind.
- Works continuously to ensure compliance with labor laws, including laws that regulate wages and working hours.
- Respect the rights to freedom of association and collective bargaining, and the right to freedom of expression.

This policy applies to all employees, workers, consultants, and other persons doing business with Zaptec ASA including all its wholly owned or controlled subsidiaries or majority joint ventures, its contractors, and its direct suppliers. We commit to protecting and improving conditions for workers by identifying, preventing, and mitigating human rights violations. Zaptec does not tolerate violence against human rights defenders or peaceful protesters that are against our operations.

### Our approach

We want to make a positive impact and thus we need to know if there are any human rights violations in our supply chain, so that we can use the opportunity to improve them. Our Human Rights due diligence is used to identify and prevent human rights violations in our supply chain and communities:

- As members of the Responsible Business Alliance, we use their tools to monitor actively our supply chain, and we use their whistleblower platform to enable workers to speak up anonymously.
- Our suppliers are required to comply with our Code of Conduct.
- We use our knowledge of our stakeholders, materials, and electronics industry to conduct our annual human rights due diligence. This information is used to improve our sustainable supply chain work and make sustainable material choices. We will regularly conduct stakeholder engagement to ensure that we are up to date with our stakeholders' expectations.

- We report on our annual Communication of Progress in our United Global Compact report, which is available online for all stakeholders.
- Continuous improvement is a guiding principle in our sustainability work. We cannot wait to act; and, we continuously seek to improve our performance.
- We report openly on our human rights due diligence and progress annually.

### **Remediation**

In case we discover any wrongdoings for human rights and decent working conditions in our supply chain or operations, we will ensure that these violations are reported to the highest-level executive of our company. We are committed to rectifying the situation according to the UN Guiding Principles on Business and Human Rights and the Transparency Act. Withdrawing from the contract is our very last resort, as we believe in improving the situation rather than walking away from it. In order to ensure remediation, we will assess, investigate and draw on other tiers in the supply chain as necessary to make sure that the situation is corrected.

### **Our expectations**

We must share a common commitment to the International Bill of Human Rights. Zaptec relies on transparent and cooperative employees, suppliers, and partners, and expects our suppliers to sign and comply with our code of conduct. We use the tools provided through the Responsible Business Alliance to report on human rights efforts, impact and taking action to ensure that our human rights expectations are upheld. In addition, we expect compliance with the EU Conflict Minerals Regulation, and other relevant regulations.

**Date of approval: 09/01/2026**

**Date for next review: 09/01/2027**

**Approved by: Zaptec CEO Kurt Østrem**

### **Notes and Explanations**

*“The international bill of human rights” encompass:*

- *The Universal Declaration of Human Rights*
- *The International Covenant on Economic, Social and Cultural Rights*
- *The International Covenant on Civil and Political Rights*
- *Optional Protocol to the International Covenant on Civil and Political Rights*
- *Second Optional Protocol to the International Covenant on Civil and Political Rights*