



# Corporate social responsibility

Last updated: January 2026

This is a document that outlines the framework the company operates within. It presents its vision, ethics and taxation, and how it protects people, the environment and the community. Zaptec's Board of Directors has overall responsibility for ensuring that this policy and its implementation comply fully with the Company's legal and moral obligations

#### ZAPTEC'S VISION

Zaptec will change the world for the better by creating a more sustainable, electrical future, providing cutting-edge EV charging solutions. Zaptec is on a journey to enable better personal mobility for the many. Born on the rugged west coast of Norway, where horizons stretch far, it is clear to the company that travel, and exploration are a natural part of what makes us human. Zaptec is passionate about finding and enabling better ways to travel.

By combining the latest tech with human-centered design, Zaptec offers highly intuitive and efficient EV chargers that ensure easier access to personal electric transport.

By offering cutting-edge, green-tech charging solutions, Zaptec enables the electrification of the transport sector while giving people the freedom and potential to travel into a more sustainable future. So, whether you're planning a quick trip to the shops or aiming further into the distance, Zaptec is passionate about being the power behind your journey.

Within just a few years, Zaptec has built a leading position in the domestic market by supplying superior charging installations for housing co-ops and private homes alike. And as a Norwegian EV pioneer, our goals are aimed at bringing the best charging technology from the Norwegian coast to the rest of the world.

#### POLICY BRIEF & PURPOSE

Zaptec's corporate social responsibility (CSR) policy refers to the responsibility Zaptec has to all of our stakeholders and the elements connected to our business operations. We continuously address key issues such as business ethics, excessive benefits, taxation and wages, and protecting people, the environment and the community.

Zaptec is continuously working to be a responsible business that meets the highest standards of ethics and professionalism.

Zaptec CSR will be separated into two parts – one that is required by law, and another that involves a moral obligation to ensure the greater good.

Zaptec will:

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Respect the law

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Ensure that all its business operations are legitimate

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Honour ethical business practices

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Ensure there are open and transparent partnerships with stakeholders

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BUSINESS ETHICS  
AND INTEGRITY

Zaptec will always conduct business with integrity and respect for human rights. The company promotes:

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Fair dealing

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Respect for the customers, partners and  
other stakeholders

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Anti-bribery and anti-corruption practices

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Rights to organise and protection of whistleblowers

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Zaptec places the utmost emphasis on ethics, integrity and business morality, both internally and externally, in all markets where it operates, both in Norway and abroad. These principles ban forced and compulsory labour, prohibit bribes, ensure voluntary employment, establish minimum age requirements, compensate workers with wages and benefits, and enforce compliance with the labour laws in the countries where Zaptec conducts business. Employees must support ethics, integrity, and business morality by ensuring that everyone is treated with equal respect and that no unfair means (such as, but not limited to, financial gain) shall be used to alter this. Zaptec also establishes data protection, privacy and intellectual privacy standards. Accordingly, the company complies with all legal requirements, which apply to all global employees, subsidiaries, members of the Board of Directors, and stakeholders.

IMPARTIALITY

Zaptec's employees shall avoid conflicts between their own interests and the interests of the company.

For this reason, no employee shall participate in or seek to influence matters that, in special circumstances, could undermine confidence in the employee's independence or impartiality. Such circumstances shall be deemed to exist if the actual employee or any close associates of the employee have a direct or indirect interest in the matter.

Anyone who feels that their impartiality is compromised shall immediately inform their manager of the matter in writing. They shall do their utmost to distance themselves from the matter and to restore their impartiality.

GIFTS AND OTHER FINANCIAL BENEFITS

Zaptec adopts a zero-tolerance approach to bribery and corruption and has implemented an Anti-Bribery and Anti-Corruption Policy to set out the requirements and expectations for its employees and other representatives.

Zaptec's employees shall neither directly nor indirectly offer or accept payments, gifts, travel, accommodation, hospitality, discounts for personal purchases, or other benefits if this:

1. is not in accordance with recognised business hospitality or considerations, or
2. is not modest in nature with regards to value and frequency, or
3. cannot be considered appropriate in terms of time and place, or
4. may influence behaviour in favour of certain business associates, or
5. could otherwise be perceived to influence an individual's behaviour in a negative manner

The CFO must be informed if any employee or their close associates are offered personal benefits that exceed these limitations, or in the case of any doubt regarding such matters.

Employees shall neither directly nor indirectly have any personal business relationships with suppliers from which the company purchases products or services without the consent of management.

No employees shall offer or provide unlawful or unwarranted financial or other benefits to or for employees of any sector or employees of customers with the purpose of achieving or retaining business benefits.

The above shall, among other things, mean that employees are prohibited from using special procedures such as subcontracts, purchase orders, consultancy agreements and similar to provide unlawful or unwarranted financial or other benefits to the aforementioned persons.

In the event of any doubts relating to the company's policy, please contact the CFO for clarification.

## **EXPECTATIONS OF THE COMPANY**

### **RIGHT TO ORGANISE**

Zaptec provides its employees with the right to organise without repercussions from the management. This forms part of the Scandinavian model of working that has applied since the middle of the 20th century. It is important to introduce the best aspects of the Scandinavian work culture to the markets Zaptec operates in.

### **WHISTLEBLOWERS**

Whistleblowing refers to the reporting of possible illegal, or suspected illegal, actions and violations of Zaptec Cares. Violations include, but are not limited to, fraud and corruption, harassment and discrimination, violations of environmental and human rights laws, and exploitation in any respect. All employees are urged to report any wrongdoing or suspicions thereof, either to the employees' representative, the CFO or anonymous through Zaptec's whistleblowing system.

Reporting with Zaptec can take place in the following ways:

- to the company's CEO,
  - to immediate manager,
  - human resources
  - to safety representative or,
  - through the whistleblowing channel, IntegrityLog: [Whistleblower](#).
- Through this channel whistleblowing reports can be done anonymously.

## **B. TAXATION AND WAGES**

### **TAX POLICY**

Zaptec's tax policy focuses on tax compliance and tax efficiency. All material business transactions shall be proactively reviewed from a tax perspective and implemented in accordance with tax laws. Zaptec will continue to further develop tax control and tax risk management systems to ensure tax compliance. All legal entities shall submit tax returns to the competent tax authority in a timely manner and in compliance with legal obligations. Zaptec will conduct tax planning to the extent required to secure the efficient handling of taxes within the constraints of the tax law. Zaptec does not have and will not conduct any aggressive tax planning activities.

Zaptec does not have and will not have any business activities in countries listed as tax havens based on the current definition and list published by EU (<https://www.consilium.europa.eu/en/policies/eu-list-of-non-cooperative-jurisdictions/>). Zaptec's approach is also not

to engage with suppliers and partners based in tax havens. Zaptec aims for an open and transparent relationship with the tax authorities and aims to be transparent towards external stakeholders.

## HOW ZAPTEC MANAGES TAX RISK

Zaptec defines tax risk as the risk that a Zaptec legal entity fails to pay or collect the correct amount of tax at the correct time, and/or fails to satisfy compliance and reporting requirements in a tax jurisdiction. The Zaptec framework ensures that Zaptec's governance adheres to formal requirements, as well as to requirements made by the Board, the CEO, the business operations and the staff functions. It contains the governance required at the overall level in Zaptec. This is documented in binding governance documents, which include a specific instruction for taxation. The tax instruction assigns or (where already assigned by law) states all tax-related responsibilities for roles within the business. Internally, Zaptec's tax function is the CFO's team, supported by external auditors covering the markets in which the company operates. In addition, tax areas such as transfer pricing, tax strategy and financial tax reporting are handled in tax working groups with the CFO. The CFO in turn reports to Zaptec's Board. Zaptec will ensure that applicable tax competence and resources are allocated to ensure that all tax areas and all business activities are managed to ensure tax compliance and tax efficiency. The tax function is responsible for ensuring that tax-related checks and controls are implemented in the systems, and that there are processes in place regarding standard transactions. Zaptec's consolidated results are published quarterly. Integrity, which involves conducting business in a fair and responsible manner, is one of the principles Zaptec aims to follow closely. Employees at all levels in the organisation and consultants must take ownership and personal responsibility for acting in accordance with the law and with the company's ethical standards.

Zaptec does not undertake any aggressive tax planning activities. Zaptec engages in tax planning to secure tax compliance and the efficient handling of taxes. Zaptec shall be tax compliant and tax efficient. Whilst tax laws are not always definitive, Zaptec takes corporate social responsibility into consideration in tax planning activities. Zaptec shall pay the right amount of taxes in each country where it operates. Zaptec shall apply country-specific tax incentives for investments in that country. Zaptec aims to achieve an open and transparent relationship with the tax authorities in each country where it operates, and enters into country-specific enhanced relationship systems where available. Zaptec shall ensure that all requests from tax authorities are handled in a timely, efficient and thorough manner.

## MINIMUM WAGE

### WAGE ADJUSTMENTS – PROCEDURE

The procedure in brief:

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1. The framework for the annual wage settlement is set out by the company's management team.
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2. Department managers with HR responsibility will be informed of the frameworks and conditions for the year.
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3. Each manager will subsequently draw up a proposal for wage adjustments within the framework applicable to their unit.
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4. The wage adjustments are reviewed and approved by the management team before taking effect.
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## WAGE POLICY

### Objectives of the wage policy

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The company shall offer competitive conditions so that it can recruit and retain well-qualified personnel.

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The company shall use individual pay reviews to motivate and stimulate creativity, flexibility, and outstanding effort.

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The company shall give equal consideration to the duties, responsibilities and skills required for roles in terms of pay, regardless of the organisational or positional level.

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The company shall pursue a wage policy that is consistent with the principles that form the basis for the policy, so that it is perceived as predictable and fair.

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## WAGES

Wages are compensation for work and responsibilities, and shall reflect the duties, responsibilities, skills requirements and performance of the role. Wages consist of a basic level for the role, an element linked to the length of service, and an individual element that will reflect the additional efforts for which the individual is being compensated.

## PRINCIPLES FOR WAGE DETERMINATION

Wages shall be determined within the framework of the central agreements, local agreements and wage policy guidelines that are applicable at any time. All wage adjustments shall be performed accordingly. The most common form of wage adjustment is fixed wage increases, but one-off payments in the form of bonuses or similar may also be relevant if good measurement methods are available.

## ASSESSMENT CRITERIA FOR POSITIONS

All job categories are associated with job descriptions that specify the role, skills requirements, main duties and areas of authority, so that these are clearly defined for both managers and employees. Using the job descriptions, the company can assess job groups across the organisation on a genuine, non-discriminatory and comparable basis.

## PERFORMANCE ASSESSMENT CRITERIA

To ensure that individual pay reviews are generally consistent and fair, the criteria must be known and accepted. The following list is not intended to be exhaustive. Zaptec will assess the employee's performance using the following criteria:

Work performance and goal attainment	in relation to defined goals and performance requirements
	in relation to what is expected based on education and experience
	quality and quantity in relation to goals and quality standards
Planning and organisation	proper and realistic planning and prioritisation of duties in the short and long term
	ability to follow up on plans
	ability to organise themselves and others
Independence, initiative, and flexibility	new ideas
	ability to combine previous experience with current duties
	making decisions in accordance with delegated authority
	ability to assess whether a decision was good or bad and take responsibility for it
	willingness and ability to take on new duties

	ability to distinguish between the issues and individuals
	listening, seeing a matter from multiple sides, and accepting the views of others
Collaboration and communication	co-operating and respecting others, even if there is disagreement
	sharing success with those who have participated
	service-oriented, externally and internally
	honesty and integrity
Loyalty	not violating rules and guidelines
	expressing disagreement to the individual responsible for the matter
	supporting decisions that have been made
	talking to one another, not about one another
Leadership	the performance of management duties is assessed in relation to the management principles agreed upon

#### HUMAN CAPITAL RETENTION

As part of the growth strategy, Zaptec must retain its employees. Part of this work involves the creation of compelling benefits for employees. In addition to the standard benefits, such as salary, pensions, insurance etc., Zaptec offers a bonus for employees. The annual bonus is dependent on Zaptec's overall financial results, ensuring an alignment of interest between the Company's employees and shareholders.

	... does not risk the health and safety of employees or the community.
Zaptec ensures that the company:	... avoids harming the lives of local and indigenous people.
	... supports diversity and inclusion.

HEALTH AND SAFETY OF EMPLOYEES

The health and safety of employees is fundamental to Zaptec’s corporate culture. It is guided by the principles outlined in the Norwegian Working Environment Act, which sets and enforces government-mandated standards that assure safe and healthy work environments.

Zaptec’s goal is zero serious incidents and will aim to achieve this through prevention, systematic risk assessments, training, and continuous improvement. All employees, consultants and others at Zaptec’s offices shall work in a safe environment free from harm. The offices must provide an environment with sufficient protective equipment for operations for which this is required and HSE-optimised workstations for those who need them. Any questions or concerns regarding the health and safety of employees should be directed in writing to the manager or the HR manager.

HUMAN RIGHTS

The company is dedicated to protecting human rights. Zaptec is a committed equal opportunity employer and will abide by fair labour practices. As a company subject to the Norwegian Transparency Act (Åpenhetsloven), Zaptec conducts human rights due diligence across its operations and supply chain in accordance with the OECD Guidelines for Multinational Enterprises, publishes an annual report on its human rights efforts, and implements preventive, mitigating and remedial measures where risks or adverse impacts are identified. The company’s main goal is to ensure that its activities do not directly or indirectly violate human rights in any country (e.g. human trafficking). Zaptec has implemented a Human Rights Policy to set out the requirements and expectations for its employees and other representatives.

Through its Human Rights Policy based on the International Bill of Human Rights and Modern Slavery Act, Zaptec communicates a zero-tolerance approach to any form of modern slavery or child labour, expresses its respect for the rights of freedom of association and freedom of speech and declares continuous efforts in order to ensure compliance with labour laws across its value chain. The Company is committed to acting ethically and with integrity in all business dealings and relationships, and to implementing and enforcing effective systems and controls in order to ensure that human rights violations do not take place anywhere in Zaptec’s own business or those of its partners or suppliers.

The Company is committed to ensuring transparency in its own business and in the approach to tackling modern slavery and violations against human rights throughout its supply chain. Zaptec expects the same high standards from all contractors, suppliers and other business partners, and is evolving and updating its contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or of anyone held in slavery or servitude, whether adults or children, as outlined in the Company’s Supplier Code of Conduct. The document has its foundation in Responsible Business Alliance (RBA) Code of Conduct and UN Guiding Principles for Human Rights, and the provisions in the code are derived from internationally recognized standards such as the ILO Declaration on Fundamental Principles and Rights at Work and UN Universal Declaration of Human Rights. Zaptec, subcontractors, partners and stakeholders have an obligation to familiarise themselves with Zaptec’s procedures in order to help in the identification and prevention of modern slavery and violations against human rights, and to conduct business in such a manner that

the opportunity for and incidence of modern slavery and violations against human rights is prevented.

Whilst recognising the statutory obligation to set out the steps the Company has taken to ensure there is no occurrence of modern slavery, human trafficking and other violations against human rights in its supply chains, Zaptec acknowledges that it is impossible to conduct a full-scale audit of individuals and organisations in the supply chains. To underpin the compliance with practical steps, however, Zaptec intends to implement the following measures:

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... conduct risk assessments to determine which parts of the business and which suppliers are most at risk of modern slavery and violations against human rights, so that efforts can be focused on those areas;

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... engage with suppliers to ensure there is no occurrence of human rights violation in their businesses. Zaptec reserves the right to terminate any supply agreement, arrangement or other contract without compensation if a supplier is found to have engaged, or is found to be engaging, in human trafficking, slavery and other violations of human rights, or refuses to co-operate with any audit in order to verify compliance with this document;

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... where a risk assessment deems it required, conduct supplier pre-screening (for example, as part of the partnering process) and self-reporting for suppliers on safeguarding controls;

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... introduce contractual provisions for suppliers to confirm their adherence to this policy and their acceptance of Zaptec's right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

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Ultimate responsibility for the Company's actions to prevent modern slavery and other human rights violations rests with the Company's leadership where the CFO is the ultimate responsible. Zaptec's Board of Directors has overall responsibility for ensuring that this policy and its implementation comply fully with the Company's legal and moral obligations. It is, however, the shared responsibility of the employees, consultants and others within the organisation to be vigilant and to ensure compliance with Zaptec's human rights policy.

To report any suspicion of human rights violation in form of slavery or human trafficking, the HR department and the CFO should be notified in writing without delay. Confirmation of a registered case should be issued prior to starting the internal process.

## DIVERSITY

Diversity within the organisation is key to driving sustainable business. Inclusive and diverse companies are known to generate higher revenue and to access markets more easily than others. It is therefore important to ensure that the hiring policy reflects this.

Zaptec is working to ensure that there is an adequate balance with regard to gender, race, nationality and religion. The company has, for example, made sure that qualifications and skills in addition to diversity is a pre-requisite when recruiting, especially to the C-suite. This is not enough, and there remains a need to include more women and more variety in race, nationality and religion within the C-suite. In 2024 the proportion of women in management was 12,5%. When recruiting the underrepresented gender will to a greater extent be encouraged to apply. In this way, the Group will try to increase the proportion of women in the job categories where this is particularly low.

#### **D. THE ENVIRONMENT**

Zaptec is committed to protecting the natural environment. Keeping the environment clean and free from pollution is to everybody's benefit. Zaptec will seek to follow best practice when disposing of garbage and using chemical substances. Stewardship will also play an important role. Zaptec's environmental policy helps maintain a safe and healthy environment for employees, while also ensuring its commitment to environmental responsibility. The overall goal is to reduce carbon emissions within the next few years. This is an ambitious goal for a production facility that creates an advanced technical product with multiple components. Steps on the road to becoming carbon neutral include identifying and mitigating with the goal of eliminating and compensating the emissions. Emissions are calculated with assistance from an external party to ensure that accurate information is available. Emissions data will be published in the 2025 annual report.

To achieve the goals, Zaptec's environmental management programmes shall comply with the relevant environmental legislation, rules and regulations prescribed by the cities, states and countries in which it conducts business.

Apart from complying with legal obligations, the company will work proactively to protect the environment. Examples of relevant activities include:

- Reducing transport needs locally and beyond
- Researching and implementing environmental policies

Zaptec works to mitigate climate change. It does this by ensuring that the company takes a holistic, climate-friendly approach, regardless of whether this concerns research, development, sales, support, or any other operations where the business is present. The company is committed to reducing emissions both in its internal operations and in the overall market. The reduction of global transport emissions is Zaptec's main contribution to combatting climate change. Ensuring that even more electric vehicles can find a place to recharge and increasing the competitive edge of the electric transport sector are areas where Zaptec makes the most significant impact.

The waste policy is to recycle in accordance with local laws. In addition to this, Zaptec also works towards exceeding the minimum provisions of local laws to ensure that the company is at the forefront of the industry. Zaptec is working to calculate total emissions and implement emission reduction plans. In order to reduce emissions, the company has identified the following objectives with associated action plans:

OBJECTIVE 1

To reduce emissions from local transportation

ACTIONS

Zaptec seeks to motivate employees to use public transport, cycle or otherwise use a car-sharing solution to work and aim to have annual competitions and events to provide motivation.

In addition, the company shall also provide an electric charger for every employee. This is to facilitate a shift to sustainable transportation for everyone.

RESULTS

Anyone travel by virtue of public transport, cycling or car-sharing will be viewed as a success, and we will continue to advocate this.

Regarding the Zaptec charger, this will be considered a success if every employee has at least one electric car at home, ensuring that most local trips can be undertaken by using an electric vehicle.

OBJECTIVE 2

To reduce emissions from long-distance transportation

ACTIONS

Each employee must evaluate the need to travel for business trips. If it is for one single meeting, the meeting should be conducted online instead. If there is an option to take the train instead of flying, this should be chosen. In some countries, this is not feasible, but if the train only takes a short while longer than the plane, including transport to the airport, check in, security, flight time and travel from the airport, this option should be chosen.

RESULTS

If Zaptec manages to reduce the number of work trips by more than 50% within an ordinary year, this will be considered a success. If Zaptec does not achieve this, reviews of each trip will be conducted to ensure that unnecessary trips are avoided in the following year.

If 30% of plane trips are replaced by train, this will also be considered a success. If this target is not achieved, it will be necessary to review the strategy to identify whether Zaptec could reduce travel in other ways.

## Continuous improvement

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ACTIONS	RESULTS
We aim to continuously learn from others and improve our the CSR policy seeking to not merely meet today's standard but overdeliver on a consistent basis.	Annual audit of the CSR policy identifying improvement and implementing those will be a success.

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Zaptec is committed to reporting on its CSR each year, which ensures that the company's progress is reported.

### E PARTNERS

Zaptec requires partners and other stakeholders to have a clear and well-developed CSR policy. There will be unannounced control visits Zaptec to evaluate that such a policy is in place and is being followed. Any failure to have this will endanger the contract. Zaptec will verify partners' CSR policies within the first quarter of cooperation; if no such policy exists, a formal notice demanding compliance will be issued and the consequences will be outlined. The ultimate measure will be the cancellation of the contract with the company.

### F. COMMUNITY

In addition to what must be done in accordance with local legislation, Zaptec has a moral obligation to support those around it. This is demonstrated through the United Nations Global Compact membership.

#### THE UNITED NATIONS

All Zaptec employees are bound by the UN Declaration of Human Rights and shall always adhere to the declaration when performing work on behalf of the company. Zaptec also encourages all employees to set good examples outside of working hours by adhering to the UN Declaration on Human Rights.

All Zaptec's employees and consultants must familiarise themselves with the declaration on the UN homepage (accessible in multiple languages): <https://www.un.org/en/universal-declaration-human-rights/>

#### THE UNITED NATIONS GLOBAL COMPACT AND ZAPTEC

Zaptec is bound by the UN Global Compact and is ready to act to promote its identity as a socially aware and responsible business. The relationship to the policy can be found on the UN Global Compact website.

### G CONTACT ZAPTEC

#### QUESTIONS

If you should have any questions or concerns, please write to [investor@zaptec.com](mailto:investor@zaptec.com), stating the subject line "Zaptec Cares questions or concerns" and your contact details.