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 **Transparency and modern slavery statement 2025.pdf**

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Transparency and Modern Slavery Act Statement – 2025

Zaptec ASA

Date: 04.06.2026

Reporting period: 1. January 2025 - 31. December 2025

Introduction

This statement is made pursuant both to the Norwegian Transparency Act (Åpenhetsloven), which came into force on 1 July 2022 and Section 54 of the UK Modern Slavery Act 2015. It outlines the steps Zaptec ASA has taken to prevent modern slavery, forced labor, human trafficking, and other human rights violations in our own operations and supply chain.

We are committed to respecting human rights and ensuring decent working conditions, in accordance with international standards including the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

About Zaptec

- Parent company: Zaptec ASA
- Subsidiaries:
 - Zaptec Charger AS
 - Zaptec IP AS
 - Zaptec Power AS
 - Zaptec Sverige AB
 - Zaptec Denmark ApS
 - Zaptec Deutschland GmbH
 - Zaptec U.K Ltd
 - Zaptec Schweiz AG
 - Zaptec France SAS
 - Zaptec Netherlands B.V
 - Zaptec Italia S.r.l
- Industry: Electric Vehicle (EV) Charging Solutions.
- Headquarters: Norway, Sandnes



- Number of employees: 222 (201 FTEs)
- Operating countries: Norway, Sweden, Denmark, Germany, France, United Kingdom, The Netherlands, Switzerland and Italy. In addition, Zaptec products are sold across Europe and to selected countries outside Europe.
- Annual turnover in 2025: 1.5 billion NOK.
- Financial reporting period: 01.01.-31.12.2025

Zaptec designs and sells smart EV charging solutions for both residential and commercial use. Our supply chain includes sourcing, production, and logistics of the Zaptec Product Portfolio which consists of Zaptec-designed and Zaptec-customized products. The products designed in-house are manufactured in Tau, Norway, and Gunzenhausen, Germany.

More information about Zaptec can be found in the 2025 Annual Report.¹

Our policies

We have implemented the following policies to prevent modern slavery and promote human rights:

- **Supplier Code of Conduct:** requires Zaptec's suppliers and partners to uphold human rights, fair labor standards, and safe working conditions.
- **Corporate Governance report:** outlines Zaptec's governance structure in compliance with rules governing the Norwegian stock exchange.
- **Human Rights policy:** outlines Zaptec's approach to Human Rights and their violations. The policy is based on the International Bill of Human Rights and Modern Slavery Act.
- **Equal Opportunities & Diversity policy for Zaptec ASA:** an internal policy, building on The Human Rights policy, defining employee rights and working conditions in Zaptec's own operations.
- **Minerals policy:** outlines our commitment and ways of working to promote responsible use of resources in our technology.

Policies are regularly reviewed and updated. All the policies, besides Equal Opportunities & Diversity Policy can be found on our website.

¹ [Zaptec_Annual_Report_2025.pdf](#)



Due diligence process

Supply Chain

Our due diligence work is led by the Sourcing team with support from the Sustainability and HSEQ departments. Findings are reported to Zaptec's management, and we communicate our efforts annually in our Annual Report and Norwegian Transparency Act Statement. These reports are published online on our website.

The work with due diligence is grounded in the OECD Due Diligence Guidance for Responsible Business Conduct and performed with the use of multiple methods and platforms that are described in detail further down in this report. In addition to that, we monitor our suppliers who are members of Responsible Business Alliance and Responsible Minerals Initiative to increase the transparency in our supply chain. We have set up routines and a separate email address to manage Transparency Act inquiries efficiently and in accordance with requirements. Our human rights policy is aligned with the United Nations Guiding Principles on Business and Human Rights, and our Suppliers Code of Conduct is based on the principles of the Responsible Business Alliance.

Own operations

Zaptec monitors compliance with human rights and decent working conditions in its own operations with use of the following measures:

- providing all employees with an opportunity to safely notify about censurable conditions at workplace through the internal whistleblowing system,
- performing internal employee appraisals and various employee satisfaction surveys,
- Carrying out a "Great Place to Work" survey annually; as a tool to identify potential areas for improvement to further enhance employee experience and trust in the company.

Risk assessment

Upstream activities

We perform ongoing human rights due diligence with a focus on our supply chain, based on stakeholder dialogue and a risk assessment of industry and geography.



Zaptec operates within the electronics industry, which is known for complex and long supply chains. We have evaluated risks from mining of raw materials, production of components, and assembly of our products. The highest risk for human rights infringement occurs at the mining level, and it decreases gradually as we move further upstream into operations and assembly.

Examples of risks identified:

- From mine to smelter
Our products use all 3GT minerals (Tin, Tantalum, Tungsten and Gold). Examples of potential risks related to this include potential involvement in armed conflict and potential violations against indigenous people's land rights in the mining areas. The extraction process also risks exposure to toxic waste due to hazardous working conditions.
- Production of components
In the component production phase, risks are linked to labour conditions in factories, such as inadequate working conditions or low wages.
- Manufacturing
Zaptec chargers are manufactured in Norway and Germany. Due to the legal measures in both countries, the labour risk associated with production in these countries is considered low.
- Environmental risks
We have identified the risk of climate impact resulting from electronics production. These risks are related to electronic waste (e-waste) which could potentially threaten health and the environment. Additionally, the extraction of raw materials and the production of electronics is resource, energy, and water intensive, imposing the risk of impacting the environment.
- Products' end-of-life
There are risks related to working conditions at e-waste recycling operations in developing countries.



Downstream activities

Zaptec is working on establishing a due diligence process for its downstream activities. Per today our work is based on the resources available to us via RBA platform. We monitor our main transport companies there. We have also utilized RBA's Supplier risk list to identify if any of the countries we sell our products to was identified by RBA as a country with a high risk for human and worker rights infringement. As of today, Zaptec sold some chargers to one of the countries categorized as high-risk by RBA, Thailand, but the company's presence in that country is limited to ca. 300 chargers and therefore considered as marginal.

As a relatively small company with a complex supply chain and a wide range of customers, we prioritized mapping out the supply chain first as that is where the risk of non-conformities is highest according to our assessment. The next step will be to perform due diligence in downstream activities.

Our actions to manage our exposure

Zaptec became a Responsible Business Alliance (RBA) member in October 2023. Since 2024, the supplier questionnaire of Human Rights has been a part of our Supplier Evaluation Form. Further, we also assess our suppliers on cyber security and information security. Our Supplier Code of Conduct (CoC) has been distributed to all Tier 1, Tier 2 and identified Tier 3 suppliers in 2024. Our goal was to achieve 100% compliance with our CoC in Tier 1 and 75% in Tier 2 in 2025. It was accomplished, and the number of companies compliant with it is still growing.

Building on pre-qualification responses, Zaptec adopts an educational approach, recommending areas for improvement to suppliers and encouraging better procurement practices with lower-tier suppliers. For instance, we may offer insights into our tool and process choices to facilitate our suppliers' adoption of sustainable practices. Using a risk-based approach, we prioritize risks through the RBA Risk Assessment Platform, spend analysis, and evaluation of received supplier assessment forms. Identified suppliers are assessed annually.

Through our membership with the Responsible Business Alliance (RBA) and the Responsible Minerals Initiative (RMI), we work to increase transparency in our supply chain and share best practices. We use RBA and RMI to connect with our suppliers, smelters, and refiners. By trading relationships on these platforms, we receive access to their self-assessments and audit results - RBA has its own auditing program, VAP (Validated



Assessment Program). It also offers its members the opportunity to influence which companies will be selected for audit by nominating them in RBA portal.

Our findings

Zaptec's products comprise several hundred components being sourced from different regions in the world, which results in a comprehensive and complex supply chain. We work continuously to increase the insight we have into the way our direct and indirect suppliers handle human rights and what working conditions they provide. If any human rights violations are found within our supply chain or operations, we report these incidents to the highest-level executive in our company. We are also committed to rectifying the situation according to United Nations Guiding Principles on Business and Human Rights.

In 2025 Zaptec performed one whistleblowing activity towards a supplier. Zaptec raised formal concern with a key component supplier at Tier 3, regarding a potential conflict of interest. The concern arose after Zaptec received a discount offer conditional on selecting an alternative supplier for a component feature, diverging from the original sourcing plan.

Zaptec subsequently identified that its primary contact at the supplier held significant ownership interest in the proposed alternative supplier. This situation created a risk that commercial decisions could be influenced by personal financial gain and cause a breach of both the supplier's and Zaptec's Codes of Conduct.

Zaptec notified the supplier's compliance body in writing, requesting an independent assessment, full disclosure of all relevant ownership interests and relationships, and a compliance/legal review. Zaptec also requested the appointment of a new contact person without financial ties to the connectivity provider, explicitly to safeguard the transparency and prevent any undue influence on Zaptec's procurement decisions.

In addition, we have also registered some cases of non-conformance discovered by RBA during audits. Examples of issues we encountered in 2025 were excessive working hours, missing access to emergency exits, and inhumane treatment (verbal, public shaming). RBA follows up all the audited parties until issues are resolved in a way that meets RBA's strict standards that Zaptec also follows and sets as a supplier requirement in its Code of Conduct. We monitor those cases and are ready to react if the findings presented in the audits do not get resolved or the solutions are not satisfactory for Zaptec.

How do we make sure that the worker's voices are heard?





Supply chain

Our 2025 goal is to ensure that all our Tier 1 and 2 suppliers have a whistleblower system in place so that any concerns can be reported by the employees without risking retaliation. This system will allow workers to anonymously voice their concerns. As of end of 2025, close to 90% of all suppliers have reported that they have a whistleblowing system in place. The RBA provides a free whistleblower platform, RBA Voices, which all our suppliers are being encouraged to use. We anticipate that this accessibility will prompt more suppliers to adopt the tool.

Own operations

To ensure transparency and trust, we have a whistleblowing procedure and dedicated whistleblower software that is accessible to all employees. It was implemented to ensure security of employees and protection from retaliation when notifying employers. It also enables reporting anonymously if preferred. To maximize the effectiveness of that tool, we have also trained all line managers on how to handle potential cases to make them feel confident and prepared for managing those. Our goal is to create a workplace where employees feel confident speaking up, knowing their concerns will be heard and addressed, while also strengthening their role in shaping the future of EV charging and our company.

Zaptec has not recorded any whistleblower incidents in 2025.

Labour conditions at our own operations

In 2025, there were no reported incidents. Zaptec continues to strengthen its health and safety management. As our highest-risk issues have been systematically addressed over time, we can now place greater focus on lower-risk areas of our operations to support continuous improvement.

Key Health & Safety developments in 2025:

- Zaptec took over operational responsibility for the personnel working in warehouses leased from our partners and introduced stricter control of warehouse HSE and working conditions. Conditions and potential hazards have been mapped to reduce the likelihood of incidents affecting employees.
- Risk assessments have been conducted for all our operations.



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- Multiple safety inspections have been carried out.
- HSE plans for 2026 have been implemented.

Access to information

In compliance with the Norwegian Transparency Act, anyone may request information about how we address actual or potential adverse impacts on human rights. Inquiries can be sent to:

Email: innsyn@zaptec.com

Postal address: Postboks 163, 4068 Stavanger

We respond to requests within the statutory 3-week deadline.

Signed

Sandnes, 04 June 2026

Ingelin Drøpping, Chair of the Board

Rune Edvin Marthinussen, Deputy Chair

Stig Harry Christiansen, Board Member

Karoline Nystrøm, Board Member

Gunnar Hviding, Board Member



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