

HUMAN RIGHTS POLICY

Introduction

Human rights are the rights we are entitled to, simply because we are human beings. They represent the universally agreed minimum conditions that enable people to maintain their dignity. Human rights are inherent to all of us, whatever our nationality, place of residence, sex, national or any other status.

Kongsberg Automotive (KA) respects and supports internationally recognized human rights. This policy outlines the company's responsibility to respect and protect human rights based on compliance with law and international guidelines. The policy is in addition to KA's **Code of Conduct, the Supplier Sustainability Manual and the Supplier Declaration ("HuRi Commitments")**. **Compliance with HuRi Commitments is required to be able to do business with KA or be a KA Personnel**. "KA Personnel" is hereafter defined as the board of directors, all officers and employees of KA and, in addition, agents, distributors, sales representatives and persons and companies that represent KA.

Agency supplied personnel and hired consultants will be considered as a part of KA Personnel if they work consecutively more than three months for KA or if they perform their work on KA's facilities.

We expect our business partners—including customers and suppliers—to uphold human rights and conduct due diligence in this area. If a business partner is implicated in human rights non-conformities or risks, KA will assess the situation to determine appropriate actions, which may include reevaluating the company's relationship with them. Breaches to the company's Human Rights Commitments can lead to consequences such as termination of contracts or other measures (e.g. corrective actions, suspension).

In line with the company's commitment, KA expects its customers and suppliers ("Business Partners") to respect human rights and conduct human rights due diligence. KA will support them in their efforts if possible and relevant.

KA is committed to **comply with** the following **international standards and laws**: the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights (UNGPs), the Ten Principles of the UN Global Compact, the ILO Declaration on Fundamental Principles and Rights at Work, OECD Guidelines for Multinational Enterprises, OECD Due Diligence Guidance, Norwegian Transparency Act, EU Charter of Fundamental Rights, the Global Automotive Sustainability Practical Guidance, Ethical Trading Initiative, Convention on the Elimination of All Forms of Discrimination against Women, German Supply Chain Act, Corporate Sustainability Reporting Directive, Corporate Sustainability Due Diligence Directive, EU Directive on Pay Transparency, UN Declaration on the Rights of Indigenous Peoples (UNDRIP).

KA's Human Rights Policy explains how the company protects the rights of people in its **own operations**, with its **business partners and the broader society**.

Human Rights in KA's own operations

Child labor and young workers: KA supports the United Nations convention on the Rights of the Child stating that all children have the right to leisure and education. KA must therefore not avail itself of children under the age of 15 years as part of its work force, except as part of governmentally approved work training, apprenticeship or similar programs, which beyond doubt would be clearly beneficial to the participants.

Wages and benefits: KA aims to provide its workers with compensation that aligns with applicable laws and industry practices, ensuring that wages support basic needs and a decent standard of living. This includes complying with minimum wage requirements, overtime compensation, medical leave, and other government-mandated benefits where applicable.

Working hours: KA strives to ensure that working hours comply with local employment regulations and applicable industry standards. The company aims to meet legal requirements regarding overtime, time-off and maximum working hours in each jurisdiction.

Modern slavery: The company's HuRi Commitments set out KA's zero-tolerance approach towards modern slavery and human trafficking, which are a crime and a violation of fundamental human rights, and include any form of slavery, servitude and forced or compulsory labor. KA takes its responsibility seriously, in the protection of fundamental human rights and the elimination of modern slavery by ensuring that slavery, human trafficking and child labor has no place anywhere in our business. This is achieved through comprehensive supplier due diligence, regular employee training, and the implementation of reporting channels, such as our anonymous reporting channel called SpeakUp®.

Ethical recruiting: KA is committed to a fair and transparent recruitment process, understanding that hiring practices can pose human rights risks. The company strives to align its recruitment processes with relevant legal standards, ensuring that all candidates are treated with respect, fairness, and in accordance with applicable laws.

Freedom of association: KA observes the rights to freedom of peaceful assembly and to freedom of association at all levels, in particular in political, trade union and civic matters, which implies the right of everyone to form and to join trade unions for the protection of their interests. This includes collective bargaining, as a process of negotiations between employers and a group of employees, aimed at reaching an agreement that regulates working conditions.

Harassment: Is defined as a harsh and inhumane treatment - or the threat of such treatment - including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers. Harassment is not tolerated by KA in any form.

Non-discrimination: Is a basic principle at KA, that requires the equal treatment of an individual or group, irrespective of their particular characteristics, including sex, race, color, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation. Non-discrimination is not tolerated by KA in any form.

Equal pay: KA is committed to ensuring equal remuneration for work of equal value, regardless of gender or other potential grounds for discrimination. While local living costs may influence pay levels, we strive to provide fair and equitable compensation across all roles. KA will continue to monitor developments related to pay transparency, including the future implementation of the EU Directive on Pay Transparency.

Diversity, equity and inclusion: KA develops and promotes inclusive cultures where diversity is valued, celebrated and everyone is able to contribute fully and reach their full potential.

Rights of minorities and indigenous peoples: KA expects all stakeholders to respect the rights of local communities, including their right to decent living conditions, education, employment, and social activities. The company recognizes their right to provide or withhold consent regarding any projects that may affect their territories, in accordance with the principles set out in the UN Declaration on the Rights of Indigenous People.

Land, forest and water rights and forced eviction: KA is committed to respecting the rights of communities and individuals regarding land, forests, and water. KA is aware of the risks associated with forced eviction and the deprivation of access to these resources, and the company strives to avoid such situations in the acquisition, development, or use of land, forests, and water.

Private or public security forces: KA is aware of the importance of aligning the use of private or public security forces with internationally recognized human rights standards. KA is committed to ensuring that security forces are not involved in any form of violence, harassment, or intimidation against employees, local communities, or other stakeholders. When security services are outsourced, the company works to ensure that its representatives understand and adhere to its Code of Conduct.

Health and Safety: KA has allocated resources for the organization of health and safety compliance and does regular risk assessment and reporting in order to ensure continuous improvement of the system. Health and safety training should include the provision of clear instructions to employees on how to ensure they carry out daily tasks safely and without risk of harm to health.

Human Rights with KA's business partners and the broader society

Business partners

KA expects all its Business Partners to adopt the same high standard that it upholds to comply with the established HuRi Commitments, and to roll down this requirement to their own business partners.

KA will support them in improving their human rights due diligence processes if needed, and if possible.

On the supply side, KA refers to detailed guidance on Human Rights and Labor Practices in the Supplier Sustainability Manual and Responsible Minerals Sourcing Position Statement. The supplier shall implement baseline safeguards and controls, that are no less rigorous than accepted industry practices in which KA operates.

Health and safety: Is a key objective for KA. The company expects its suppliers to provide and maintain a safe workplace and take proactive measures to prevent occupational injuries and hazards. The supplier must agree to provide KA with records relating to health and safety programs, training and violations when requested. Suppliers are asked to fill out a Sustainability Assessment Questionnaire (SAQ), that contains detailed questions regarding their Human Policy and Health and Safety policies. Supplier monitoring by KA can also be achieved by second- or third-party audits.

Broader Society

The company's activities have an impact on local **communities** and broader society. KA monitors any potential human or environmental related impacts and make every effort to mitigate any negative impact. It incorporates human rights into its strategic business decisions. KA makes every effort to understand how its own operations and its upstream and downstream value chain (including its products and services, its business relationships and its supply chain) impacts communities, by conducting supplier audits, supporting local social programs, and engaging in community consultations. Additionally, KA is committed to taking actions to prevent, mitigate or remediate actual or potential adverse impacts on such communities.

KA are committed to taking responsibility for climate change, social and environmental issues by reporting on sustainability efforts and adopting responsible sourcing practices.

Concerns and Grievances

The company encourages all KA Personnel and business partners who suspect any behavior which is inconsistent with the HuRi Commitments set out in this policy to contact their line manager, People and Culture department, KA's General Counsel, Chief Finance Officer or third-party provider (SpeakUp®) as described below:

- A. Click on the KA specific link to the SpeakUp® system:
<https://kongsbergautomotive.speakup.report/en-GB/kongsberg/home>
- B. Directly access the SpeakUp® online portal:
<https://www.speakupfeedback.eu/web/miw3dr/>
- C. Call the country specific local phone numbers as detailed on the latest pages of KA's Code of Conduct

KA will not tolerate any form of retaliation against KA Personnel or its business partners who raise concerns or report misconduct in good faith. All grievances should be investigated in a fair way and feedback will be shared in all cases.

Right to Information

KA identifies and assesses actual and potential adverse impacts on fundamental human rights and makes every effort to prevent and mitigate them and to communicate with affected stakeholders on related actions. The company provides further information to that effect in our yearly integrated Annual and Sustainability Report.

Risk Analysis and Due Diligence

KA is committed to respecting human rights and environmental standards in its operations and expects the same from our entire value chain. Human rights are a material issue for KA, and as such, the company has developed a risk management system to ensure that its operations and suppliers align with these standards. KA's procurement process allows it to vet suppliers, ensuring it engages only with those who commit to high ethical and business standards.

As part of this process, all prospective suppliers are required to sign the Supplier Declaration and adhere to KA's Supplier Sustainability Manual. KA assesses suppliers based on their commitment to areas such as diversity and inclusion, human rights, business ethics, and sustainability. Suppliers are categorized based on the risk exposure, including considerations of country ESG supply chain risk.

To enhance the company's due diligence process, it uses a simplified risk scoring system for pre-evaluation and require potentially high risk and impact suppliers to complete an evidence based, externally validated self-assessment. This is included in our supplier classification. KA also relies on third-party on-site sustainability audits for high-risk suppliers. This approach helps maintain accountability and ensures the company's suppliers meet its human rights and other social, environmental and ethical requirements.

Link to related documents

Access related documents by visiting KA's website at:

http://www.kongsbergautomotive.com/for_suppliers/

<https://www.kongsbergautomotive.com/company/cr-reports--certificates/>