

The Transparency Act - Westcontrol 2024

Westcontrol AS

The Westcontrol group consists of 3 companies and 4 factories located in Rogaland and Telemark. The companies provide services and products in the fields of electronics, electromechanics, precision machining, and assembly. In 2023 the group's collective turnover reached 1.4 billion kroner.

The group consists of three companies:

- Westcontrol (Tau)
- Westcontrol Robertson (Egersund)
- Westcontrol Berget (Notodden)





Westcontrol Tau

The headquarters of the Westcontrol group, with approximately 200 employees, is located in Tau.

We produce electronics, the better part of which is circuit boards, electric vehicle chargers, electronics for the oil industry, and other electronic equipment.

Key departments, services and areas of expertise:

- Research & Development Department, where we develop both software and firmware.
- NPI Department for prototyping and industrialization of products.
- Production, which comprises assembly of surface mount components (pick & place), through-hole components (manual assembly), assembly, and a test department.
- Expertise in EMC testing, component alternatives for HPHT (High Pressure High Temperature), and electronics for hazardous (EX) areas.

Westcontrol Robertson

- With a history dating back to 1946, Westcontrol Robertson AS in Egersund has accumulated extensive expertise in the development and production of electronics-based solutions.
- Initially, the aim was to create high-quality products especially for maritime and agricultural-related applications.
- Today, the company and its 50 employees serve a broad range of industries with development, electronics production, machining, and assembly.



Westcontrol Berget

In Notodden, we have approximately 160 employees spread across two locations. We produce precision mechanics, cables and cable mats, electronics, and electromechanical assemblies.

Our services consist of:

- Production of precision mechanical parts – both turning and milling – in three-, four-, and five-axis machines.
- Production of electronics, which consists of assembly of surface mount components (pick & place) and manual assembly.
- X-ray of electronic components.
- Surface treatment of electronics with parylene and lacquer.
- Production of cables and cable mats.
- Assembly and electromechanical assembly.



Our work with the Transparency Act

The Westcontrol group respects fundamental human rights and ensures decent working conditions, as well as the public's access to information. This applies to our own businesses, but we also strive to secure a similar high standard with our suppliers.

Since the law first came into effect, we have put into place routines for managing our duty to inform. We have also worked purposefully to raise awareness across the organization of this duty and how to handle it in a way that is systematic, planned, and to the point.

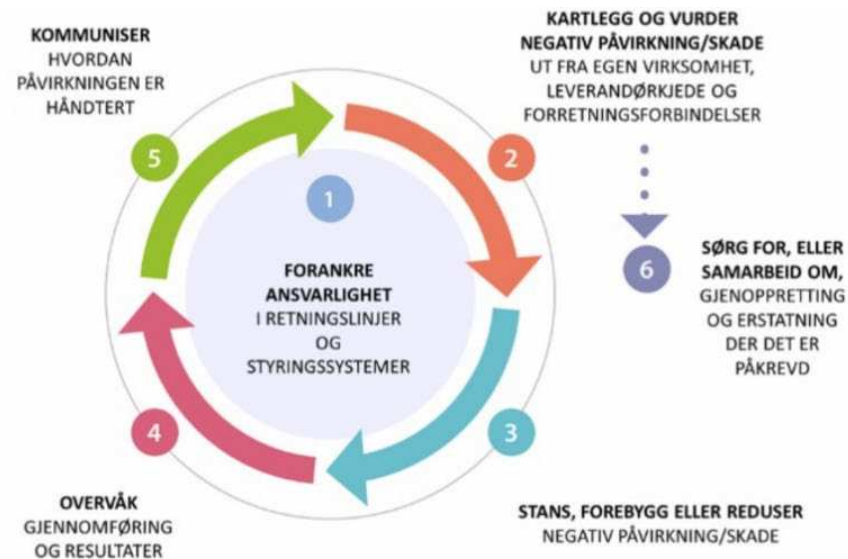


Fig: Norges kontaktpunkt for ansvarlig næringsliv.

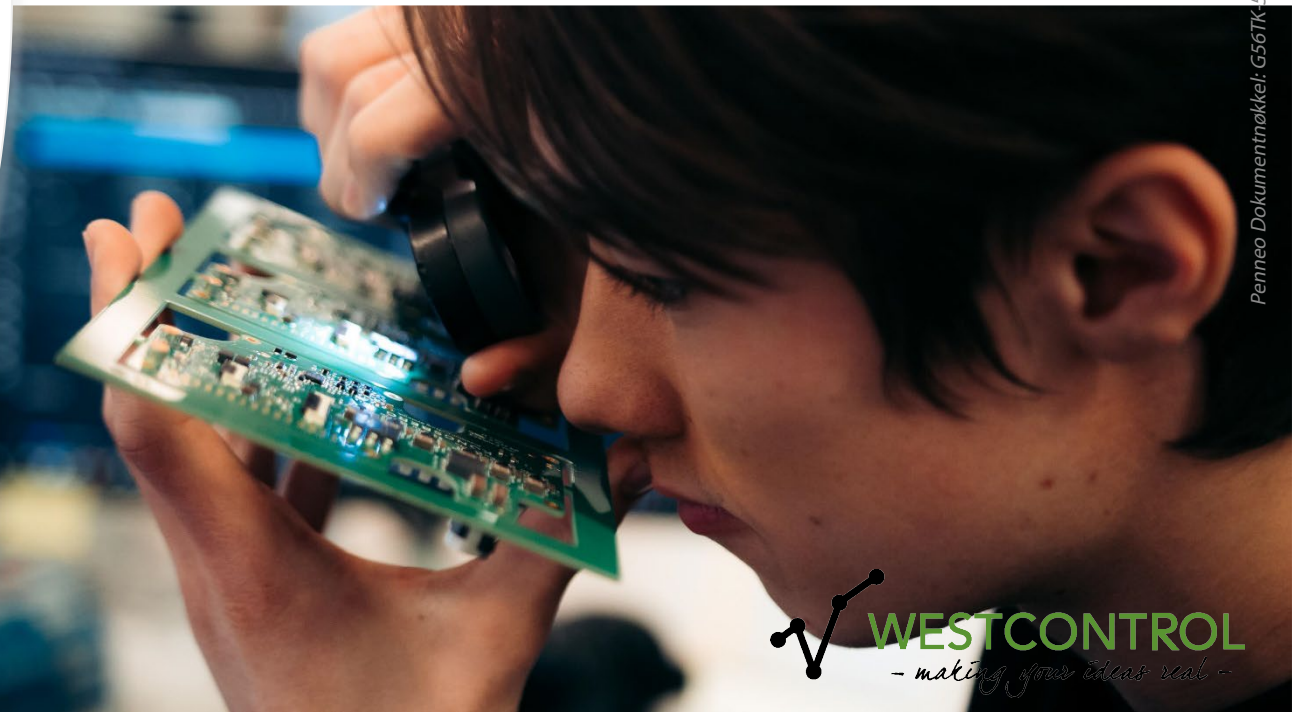


Principles, Procedures, and Standards for the Transparency Act

- Our work with the Transparency Act is rooted in our management and the entire culture of our companies. Risk management shall be an integral part of all our business activities. Focusing on the Transparency Act is a systematic approach to identifying and working to minimize risks related to our entire business. This applies across various risk categories, such as human rights and decent working conditions, as defined in the Transparency Act.
- The results of the work will be used in the group's strategy and business planning, including the development of key indicators, goals, and action plans. It shall ensure that we comply with laws and regulations in addition to the necessary management focus on risk-related issues within the group.
- This procedure is to be considered our way of complying with the legally required four-step working method to ensure that we work actively, purposefully, and systematically to ensure respect for fundamental human rights and decent working conditions, and to ensure public access to information both internally and upstream in our supply chain. The purchasing process and the procedure for the selection and follow-up of suppliers describe in more detail how human rights are followed up in the supply chain.
- A procedure has been developed for handling the duty to provide information under the Transparency Act, which describes how inquiries related to questions about the Transparency Act shall be handled.

We work to identify the risks of human rights violations and decent working conditions

- To uncover violations of human rights and labor conditions within the group and among our subcontractors, a committee has been established with representation from employees across several companies within the group.
- The committee has held several meetings to ensure the development of a system and procedures that ensure that the group complies with the intentions of the Transparency Act, and that systems are in place to ensure that the group systematically addresses these issues in the future.
- The committee has developed group policies concerning human rights and decent working conditions, criteria for due diligence assessments, as well as guidelines and procedures for how to handle this subject matter.



The Transparency Act in practice

The committee working with the Transparency Act holds quarterly meetings to ensure that the steps outlined in the act are implemented both internally and externally.

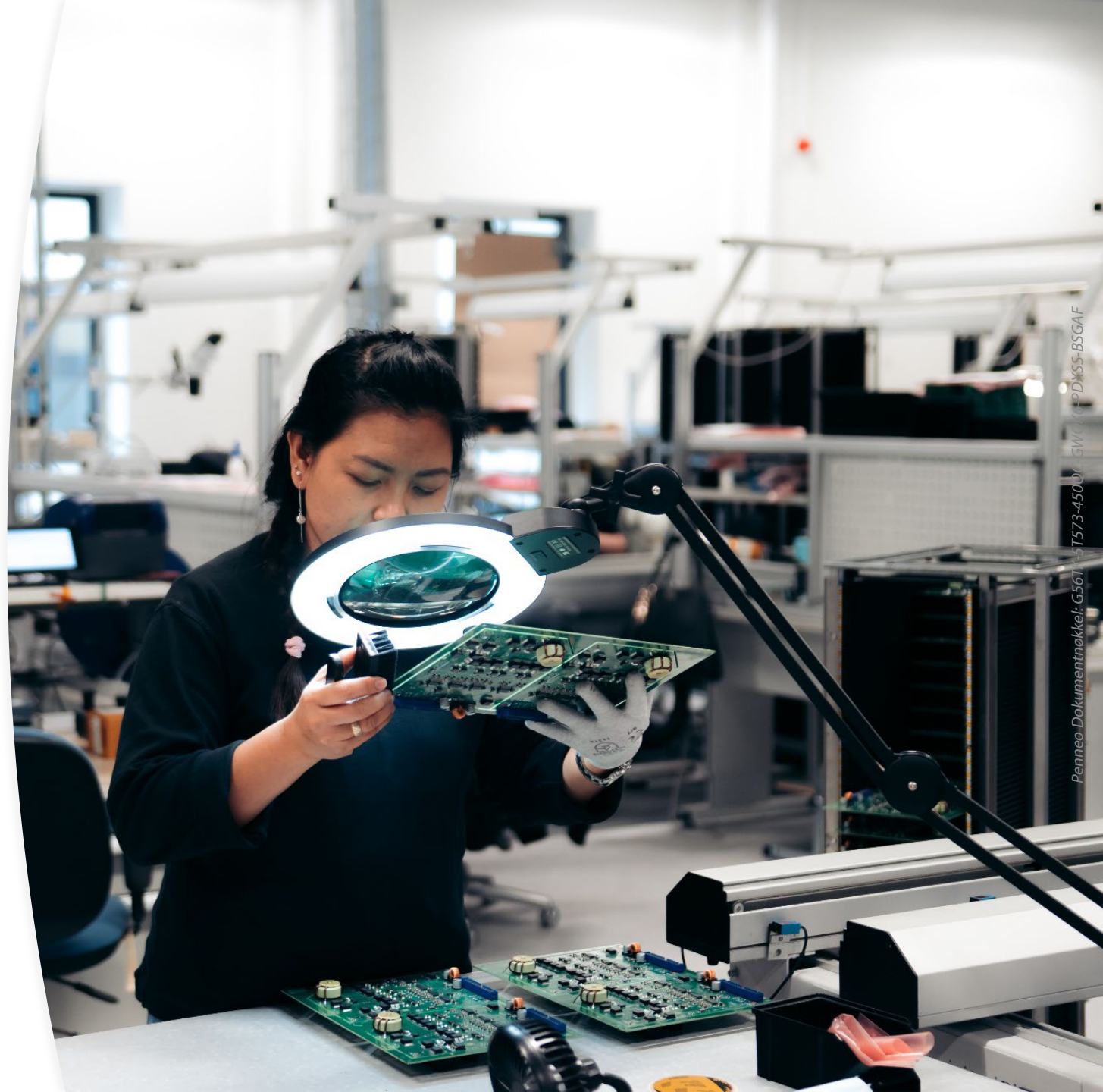
Internal Affairs:

The group ensures compliance with human rights and decent working conditions through various activities at different levels of the organization:

- Employee interviews
- Various committees (Health and Safety, department meetings, safety inspections, labor unions)
- Occupational health services
- Collective bargaining agreements
- On-boarding programs – including elements of the Transparency Act

External Affairs – Supply Chain:

- Annual supplier evaluations including due diligence assessments and risk classification of suppliers based on country and industry
- Supplier surveys conducted every three years
- Supplier audits covering, but not limited to, human rights, conflict minerals, and RoHS/Reach materials.



Risks and findings

A consequence and risk analysis has been conducted for our operations and our suppliers. No serious incidents or deviations related to human rights and decent working conditions have been uncovered.

Westcontrol has a complex value chain, with many links and suppliers. This in itself poses a risk because it makes it more difficult to have a full overview of the flow of materials, goods, and services. Westcontrol purchases many components directly or indirectly from countries with poor UN ratings. Primarily, this concerns components with metals and minerals that pose a higher risk of human rights violations. The use of rare metals also poses a risk of origin from conflict areas.

Technical components often have complex value chains with risks of human rights violations and harmful environmental impact during raw material extraction and processing. There is also a risk of forced and child labor in these value chains. The use of labor, both within our own operations and through subcontractors, is an area where there is a risk of potential violations of fundamental labor rights, decent working conditions, workplace health and safety, and gender equality. Transportation is a significant area of risk because our supply chain is global and consists of many links, where materials, components, and finished products must be transported across borders.

Negative findings and measures taken

Conflict Minerals in the Value Chain:

We have mapped conflict minerals in the value chain and found that some producers source minerals from smelters with high-risk profiles.

High-risk smelters are defined as such based on factors including location (conflict-affected and high-risk areas). When minerals from high-risk smelters are used, it may imply that the minerals in the products have financially contributed to armed conflicts or human rights violations, including slavery or child labor.

Measures: Since the mapping process is extensive, we have partnered with a third party to map and collect data on conflict minerals in the value chain. Our responsible minerals program aligns with the OECD's guidance on due diligence; therefore, our goal is to proactively identify risks and gradually eliminate those that pose concerns for our supply chain. We are working to reduce the use of minerals from high-risk suppliers by informing them of current risks and concerns and encouraging them to conduct similar due diligence assessments.



Negative findings and measures taken

Regulatory Environmental Requirements such as RoHS and REACH required more follow-up:

As an electronics manufacturer, we have a need for increased expertise in regulatory environmental requirements. Although customers own their products and have their own responsibilities for them, it is important that we stay updated and have good expertise to be able to guide our customers. Additionally, we need to make responsible choices when we can choose our materials ourselves.

Measures: We have increased our internal expertise, and we also collaborate with a third party that gathers relevant data for us and keeps us updated on changes in regulations.

Updated Code of Conduct:

As the sustainability expertise within the company has grown, the need for transparency has become ever more critical. This has led us to recognize the need to clarify the existing Code of Conduct.

Measures: It has been rewritten and updated to be more comprehensive and to focus more on environmental, social, and governance aspects. It is designed to serve as a framework for internal use and for our suppliers and other relevant stakeholders. Our employees are required to have read and understood its contents. Additionally, this is a mandatory topic for discussion with new employees.



Action Plan for the Transparency Act

Activities and measures carried out in 2023 and 2024:

- The work on the Transparency Act in the company is defined and anchored in the Board of Directors.
- Annual risk assessment regarding human rights
The Transparency Act committee conducts an annual risk assessment concerning human rights internally and in the supply chain, in addition to other risk categories.
- Ethical trading guidelines
The Board has adopted policies, due diligence assessments, and risk assessments of suppliers and business partners. All employees have been made aware of this through meetings. Additionally, this is integrated into our quality system.
- Supplier procedures and approval
All new suppliers, as well as existing large and critical suppliers, are sent a questionnaire where they must provide their ethical trading guidelines. This must be in place before the supplier is approved and included in the company's list of approved suppliers. Critical suppliers are evaluated once a year with a focus on the identified risks in the supply chain.
- Information about the Transparency Act for employees
Company management ensures that information about the Transparency Act is communicated to employees through all-hands meetings, internal newsletters, and during onboarding. Employees are also encouraged to actively participate in the work.
- Quarterly meetings in the Steering Group
The Steering Group is to hold quarterly meetings. Measures are developed to be followed up and addressed between each meeting.

For inquiries related to the Transparency Act, please contact Quality Manager Svein Rygh at svein.rygh@westcontrol.com.



Signatures

In accordance with the Transparency Act, the disclosure should be signed by the company's executive manager and board for each company to which the disclosure applies, and which has obligations under the Transparency Act.

Westcontrol Tau:

CEO: Leif Petter Skaar

Chair of the Board: Rasmus Nordbø

Board member: Tommy Aakre Mydland

Board member : Christian Pagaard Junker

Westcontrol Robertson:

CEO and Chair of the Board: Leif Petter Skaar

Board member: Pål Skadberg

Board member: Therese Neverdahl Nordbø

Board member: André Nodland Stenberg

Westcontrol Berget:

CEO: Inge Flaten

Chair of the Board: Rasmus Nordbø

Board member: Leif Petter Skaar

Board member: Therese Nordbø

Board member: Arnstein Frømyr

Board member: Kristine Solhaug

Board member: Arne Johannes Loftsgarden

Board member: Elisabeth Tønnesland

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Nordbø, Therese Neverdahl

Westcontrol Berget - Board member

Serienummer: no_bankid:9578-5994-4-740880

IP: 89.11.xxx.xxx

2024-06-25 13:17:11 UTC



Nordbø, Therese Neverdahl

Westcontrol Robertson - Board member

Serienummer: no_bankid:9578-5994-4-740880

IP: 89.11.xxx.xxx

2024-06-25 13:17:11 UTC



Christian Pagaard Junker

Westcontrol Tau - Board member

Serienummer: 7e7f1bcf-ebb1-4b72-b8d9-63e9dd2d6fff

IP: 78.153.xxx.xxx

2024-06-25 13:25:20 UTC



Flaten, Inge

Westcontrol Berget - CEO

Serienummer: no_bankid:9578-5999-4-1193433

IP: 79.161.xxx.xxx

2024-06-25 13:29:57 UTC



Skaar, Leif Petter

Westcontrol Tau - CEO

Serienummer: no_bankid:9578-5997-4-229532

IP: 79.161.xxx.xxx

2024-06-25 13:32:02 UTC



Skaar, Leif Petter

Westcontrol Robertson - CEO and Chair of the Board

Serienummer: no_bankid:9578-5997-4-229532

IP: 79.161.xxx.xxx

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Skaar, Leif Petter

Westcontrol Berget - Board member

Serienummer: no_bankid:9578-5997-4-229532

IP: 79.161.xxx.xxx

2024-06-25 13:32:02 UTC



Tønnesland, Elisabeth

Westcontrol Berget - Board member

Serienummer: no_bankid:9578-5995-4-1163537

IP: 46.230.xxx.xxx

2024-06-25 13:37:14 UTC



Skadberg, Pål

Westcontrol Robertson - Board member

Serienummer: no_bankid:9578-5997-4-361092

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2024-06-25 13:46:39 UTC



Stenberg, André Nodland

Westcontrol Robertson - Board member

Serienummer: no_bankid:9578-5997-4-4178476

IP: 213.236.xxx.xxx

2024-06-25 13:51:32 UTC



Mydland, Tommy Aakre

Westcontrol Tau - Board member

Serienummer: no_bankid:9578-5997-4-384045

IP: 89.8.xxx.xxx

2024-06-25 13:58:40 UTC



Solhaug, Kristine Lindrum

Westcontrol Berget - Board member

Serienummer: no_bankid:9578-5995-4-1653782

IP: 92.220.xxx.xxx

2024-06-25 16:06:47 UTC



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Nordbø, Rasmus

Westcontrol Tau - Chair of the Board

Serienummer: no_bankid:9578-5994-4-1486580

IP: 84.234.xxx.xxx

2024-06-25 18:30:22 UTC



Nordbø, Rasmus

Westcontrol Berget - Chair of the Board

Serienummer: no_bankid:9578-5994-4-1486580

IP: 84.234.xxx.xxx

2024-06-25 18:30:22 UTC



Frømyr, Arnstein

Westcontrol Berget - Board member

Serienummer: no_bankid:9578-5995-4-134037

IP: 79.161.xxx.xxx

2024-06-26 04:35:48 UTC



Loftsgarden, Arne Johannes

Westcontrol Berget - Board member

Serienummer: no_bankid:9578-5995-4-134457

IP: 79.161.xxx.xxx

2024-06-27 13:58:30 UTC



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