



The Transparency Act - Westcontrol 2025

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 harnesses.
- 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.

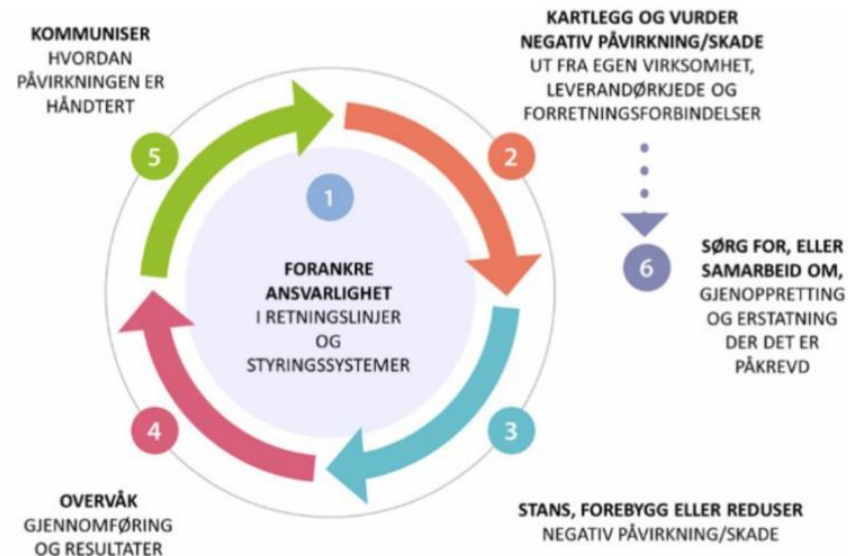


Fig: Norges kontaktpunkt for ansvarlig næringsliv.

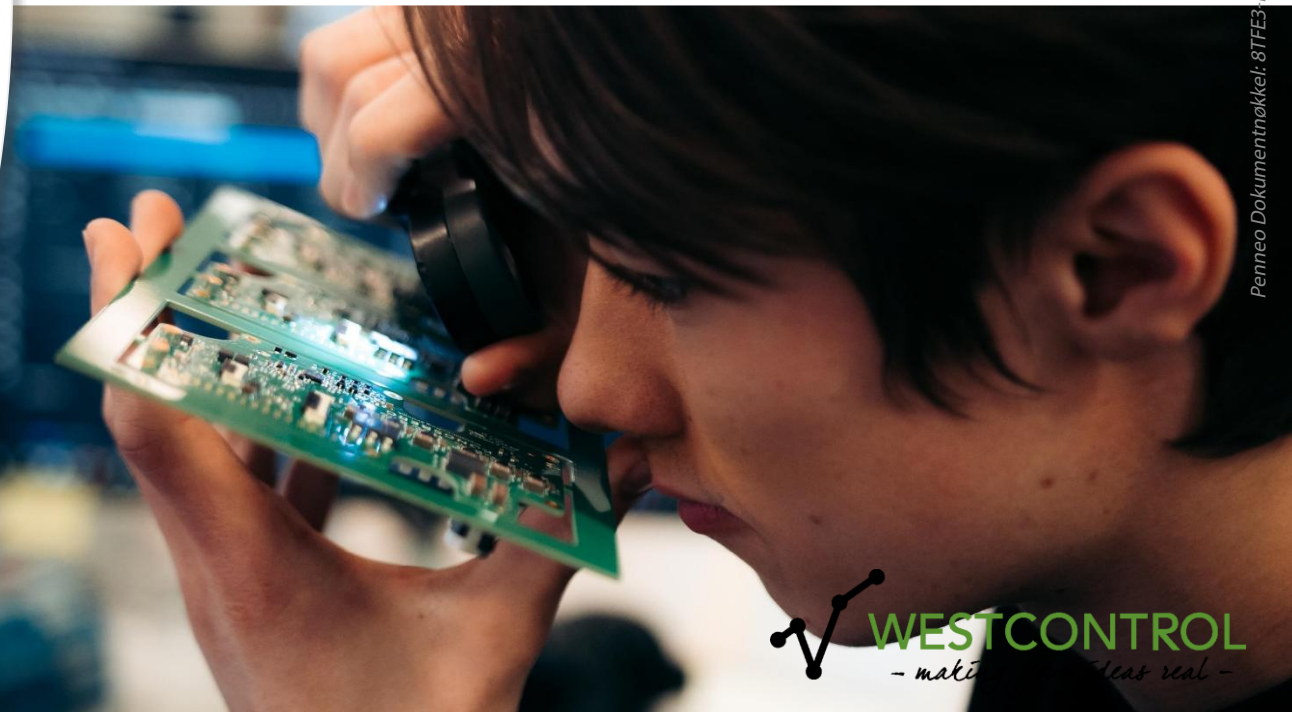


Principles, Procedures, and Standards for the Transparency Act

- 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.

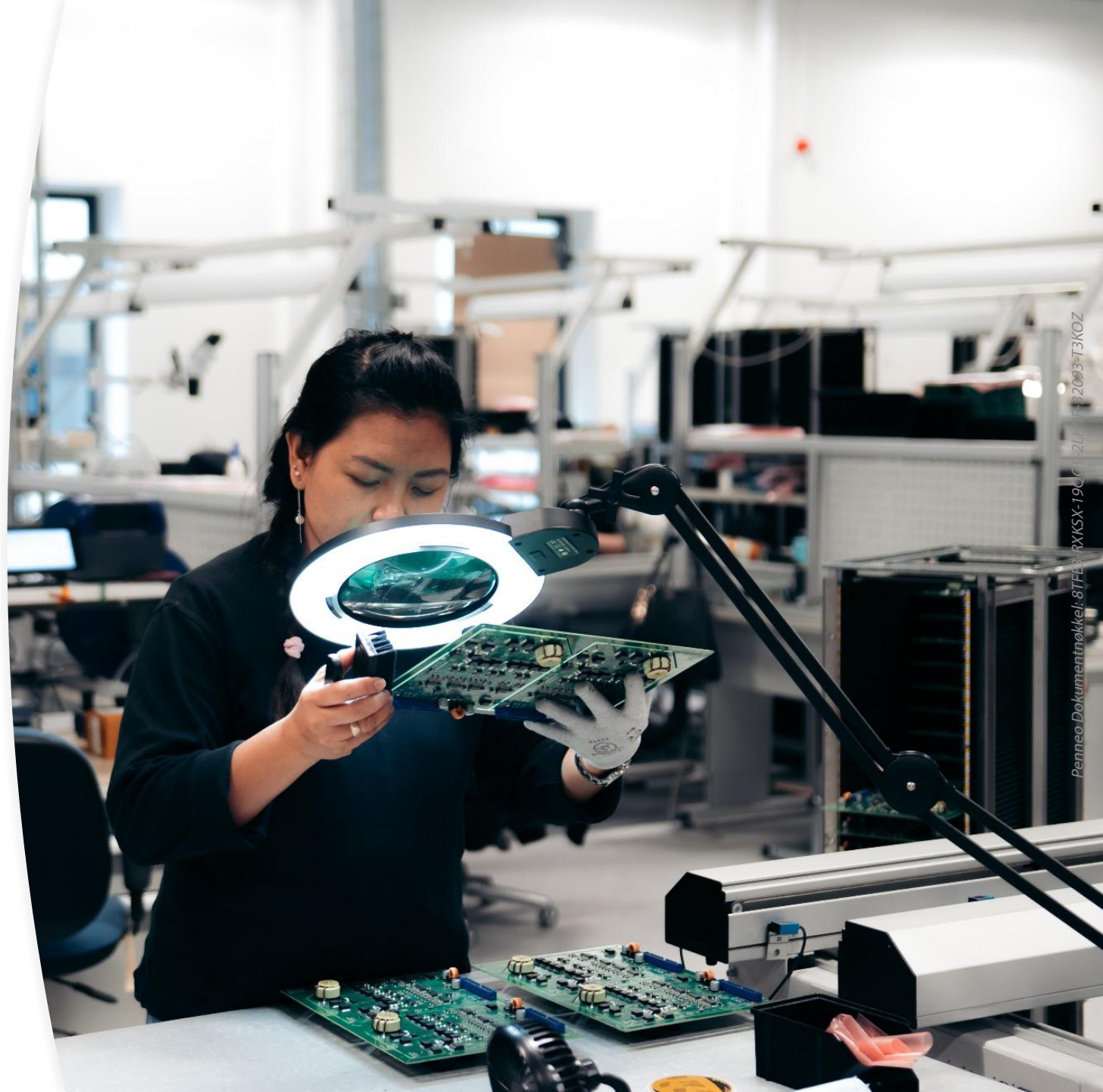
Internal Affairs:

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 Supply Chain

Through our mapping of conflict minerals, we have identified that some of our suppliers are linked to smelters classified as high-risk. This particularly applies to smelters located in areas affected by armed conflict, political instability, or weak protections for labor and human rights. Minerals from such smelters may be associated with serious human rights violations, including child labor, forced labor, and financing of armed groups.

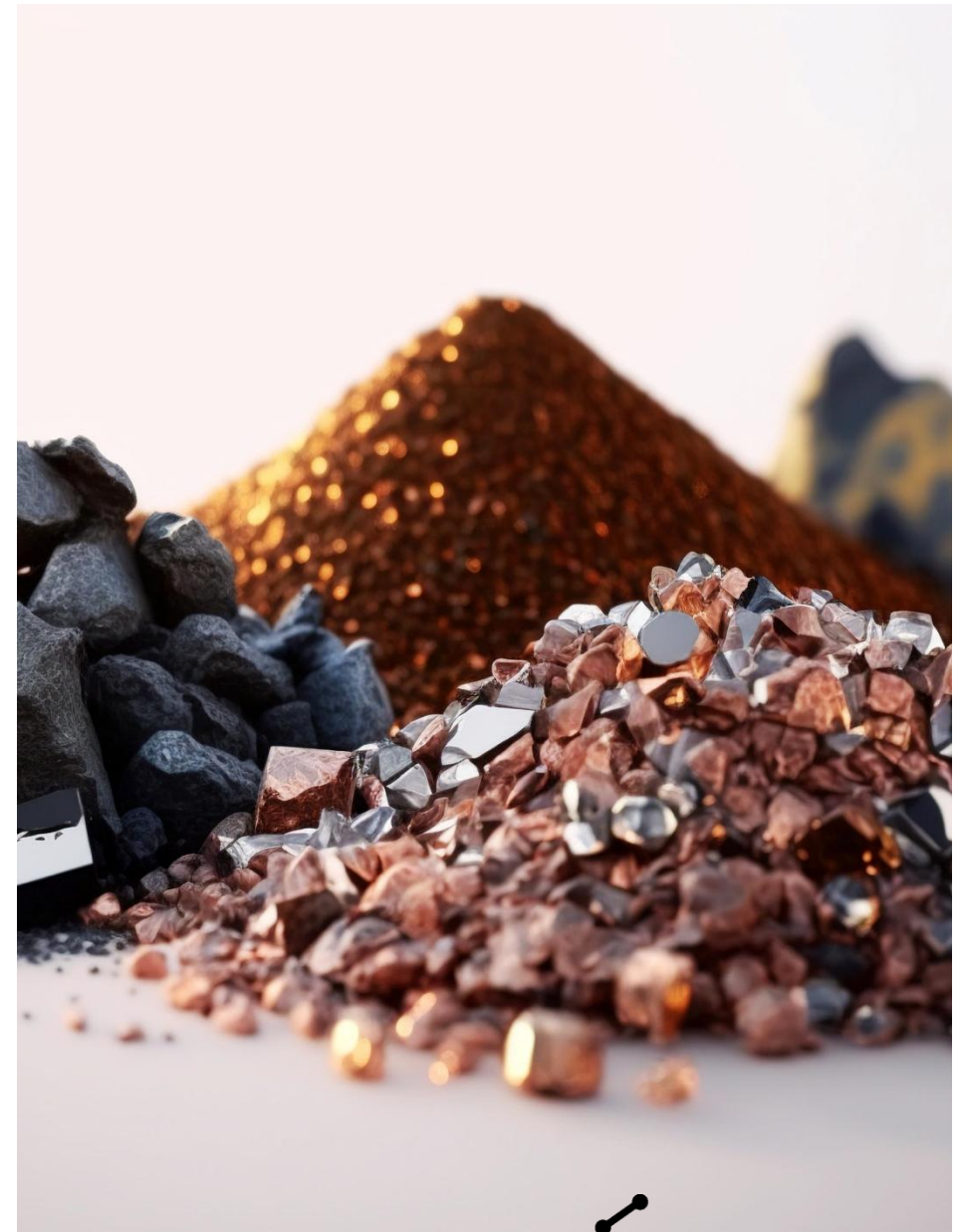
It has not been confirmed whether minerals from these smelters are actually included in products used in our production. The risk is therefore related to the upper tier of the supply chain—areas where traceability is limited and the risk of serious violations is high.

Measures: To strengthen our knowledge base and reduce the risk of human rights violations in our supply chain, we initiated a more comprehensive mapping process in 2025. The goal is to determine whether the products we use contain materials from high-risk smelters, and what measures, if any, need to be implemented as a consequence. We collaborate with a third party specializing in mapping and data collection related to conflict minerals. This work is anchored in the OECD Due Diligence Guidance for Responsible Mineral Supply Chains, and includes risk assessment, supplier requirements, and continuous improvement.

We actively work to reduce dependence on minerals from high-risk sources by:

- Requiring suppliers to conduct due diligence assessments within their own supply chains
- Providing information about identified risks
- Encouraging the use of third-party verified, responsible smelters

Our aim is to contribute to a responsible and sustainable supply chain—both within our own operations and in influencing further upstream.



Information Request in 2024

During the year, we received and responded to one information request.

Through this process, we identified areas for improvement in our internal routines and procedures. As a result, we have implemented measures to strengthen the handling of similar inquiries going forward.

This includes clarifying the proper channel for submitting requests to reach us, as well as improving internal procedures for processing and following up on information requests. The goal is to ensure a more efficient, structured, and predictable process both internally and externally.

For inquiries related to the
Transparency Act, please contact our
sustainability team at:
compliance@westcontrol.com

Action Plan for the Transparency Act

Activities and measures carried out in 2024 and 2025:

- 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. Key suppliers are evaluated once a year, focusing on the company's 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.
- Update of the Code of Conduct
As part of our continuous improvement efforts, we are in the process of updating our existing Code of Conduct. The new version will include more detailed guidelines and additional key points tailored to both industry requirements and the company's needs.

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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Tønnesland, Elisabeth

Westcontrol Berget - Board member

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IP: 79.161.xxx.xxx

2025-06-26 12:51:07 UTC

bankID



Nordbø, Therese Neverdahl

Westcontrol Robertson - Board member

Serienummer: no_bankid:9578-5994-4-740880

IP: 79.161.xxx.xxx

2025-06-26 12:55:58 UTC

bankID



Nordbø, Therese Neverdahl

Westcontrol Berget : Board member

Serienummer: no_bankid:9578-5994-4-740880

IP: 79.161.xxx.xxx

2025-06-26 12:57:27 UTC

bankID



Loftsgarden, Arne Johannes

Westcontrol Berget : Board member

Serienummer: no_bankid:9578-5995-4-134457

IP: 79.161.xxx.xxx

2025-06-26 13:33:11 UTC

bankID



Mydland, Tommy Aakre

Westcontrol Tau - Board member

Serienummer: no_bankid:9578-5997-4-384045

IP: 89.8.xxx.xxx

2025-06-26 15:00:26 UTC

bankID



Frømyr, Arnstein

Westcontrol Berget : Board member

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Christian Pagaard Junker

Westcontrol Tau - Board member

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IP: 87.104.xxx.xxx

2025-06-26 16:47:13 UTC



Nordbø, Rasmus

Westcontrol Berget - Chair of the Board

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IP: 185.80.xxx.xxx

2025-06-27 04:31:33 UTC



Nordbø, Rasmus

Westcontrol Tau - Chair of the Board

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IP: 185.80.xxx.xxx

2025-06-27 04:32:50 UTC



Skadberg, Pål

Westcontrol Robertson - Board member

Serienummer: no_bankid:9578-5997-4-361092

IP: 213.236.xxx.xxx

2025-06-27 05:01:50 UTC



Flaten, Inge

Westcontrol Berget - CEO

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IP: 79.161.xxx.xxx

2025-06-27 08:42:44 UTC



Skaar, Leif Petter

Westcontrol Berget - Board member

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Skaar, Leif Petter

Westcontrol Robertson - CEO and Chair of the Board

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2025-06-27 09:01:45 UTC



Skaar, Leif Petter

Westcontrol Tau - CEO

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IP: 89.8.xxx.xxx

2025-06-27 09:02:38 UTC



Solhaug, Kristine Lindrum

Westcontrol Berget : Board member

Serienummer: no_bankid:9578-5995-4-1653782

IP: 193.69.xxx.xxx

2025-06-30 07:28:51 UTC



Stenberg, Andre Nodland

Westcontrol Robertson - Board member

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