



WESTCONTROL

- making your ideas real -

The Transparency Act

Westcontrol Group - 2025





The Transparency Act

This report is prepared in accordance with the Norwegian Transparency Act (Åpenhetsloven) and covers the financial year 2025 (1 January – 31 December 2025).

The Act aims to promote respect for fundamental human rights and decent working conditions, as well as to ensure public access to information on how companies address these issues.

Through this report, we provide an overall account of our approach to responsible business conduct and our work related to the requirements of the Act.

This report covers all three companies within the Group.

The Westcontrol Group

The Westcontrol group consists of 3 companies and 4 factories located in Rogaland and Telemark in Norway. The companies provide services and products in the fields of electronics, cable & harness, electromechanics, precision machining, and assembly. The group consists of three companies: Westcontrol (HQ, located in Tau), Westcontrol Berget (located in Notodden), Westcontrol Robertson (located in Egersund).

Westcontrol Tau (WET)

The headquarters of the Westcontrol group, with 206 employees in 2025, 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 (WER)

With a history dating back to 1946, Westcontrol Robertson AS in Egersund has accumulated extensive expertise in the development and production of electronicsbased solutions. Initially, the aim was to create high-quality products especially for maritime and agricultural-related applications. Today, the company and its 46 employees in 2025, serve a broad range of industries with development, electronics production, machining, and assembly.

Westcontrol Berget (WEB)

In Notodden, we had 195 employees in 2025 spread across two locations. We produce precision mechanics, cables and cable mats, electronics, and electromechanical assemblies.

Our services consist of:

- Production of cables and cable harnesses.
- 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.
- Assembly and electromechanical assembly.

Governance of Responsible Business Conduct

Responsibility for compliance with the Norwegian Transparency Act (Åpenhetsloven) is anchored at the highest level of the Group. The Board of Directors holds the overall responsibility for ensuring compliance with the Act, while executive management is responsible for its day-to-day implementation and follow-up.

At Group level, the work related to the Transparency Act is organized through a dedicated steering committee consisting of key representatives from all three companies within the Group. The committee is responsible for coordinating efforts, ensuring a consistent approach across the organization, and monitoring progress.

The steering committee holds regular meetings to support the development of systems, procedures, and internal frameworks aimed at ensuring compliance with the intentions of the Act. This includes establishing a structured and systematic approach to addressing human rights and decent working conditions across the Group.

As part of this work, the Group has established a Code of Conduct outlining expectations for our own operations and employees as well as external stakeholders such as suppliers, and other business partners. This is supported by defined criteria for due diligence assessments, as well as related guidelines and procedures concerning human rights and decent working conditions.

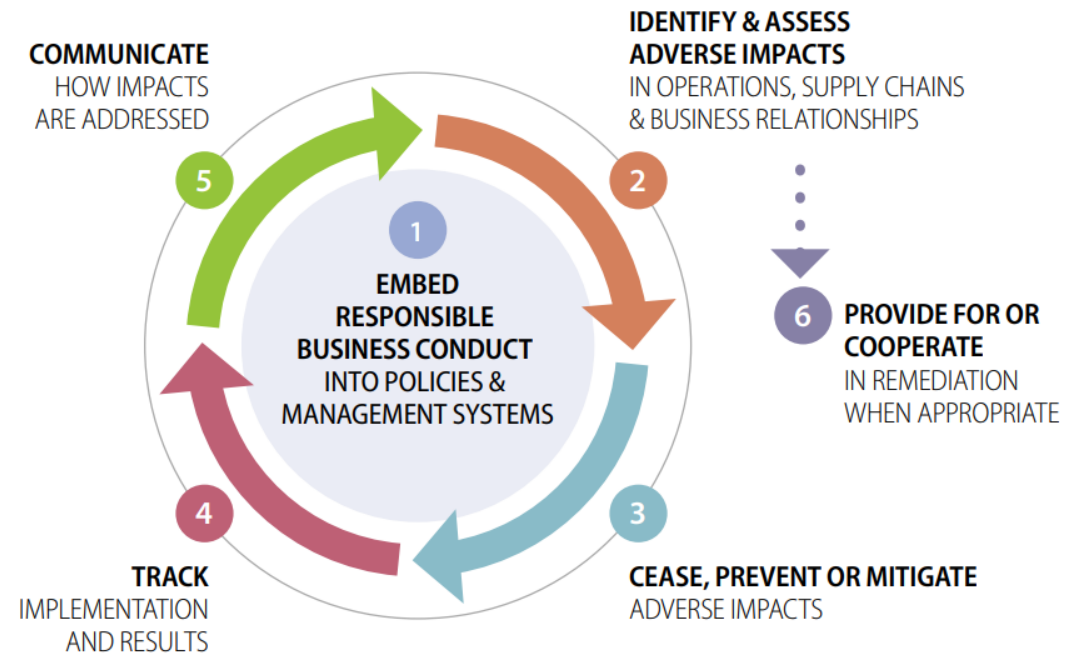
Operational responsibility is further embedded in relevant functions, including quality and sustainability, procurement, and human resources, where the practical implementation of these processes takes place.

Our work with the Transparency Act

The Westcontrol Group is committed to respecting fundamental human rights and ensuring decent working conditions, as well as providing transparency in line with the requirements of the Transparency Act. This commitment applies to our own operations and extends to our suppliers, where we seek to uphold the same high standards through our Code of Conduct.

Since the Act entered into force, we have established procedures to manage our duty to provide information. We have also worked systematically to raise awareness across the organization of these requirements and how to address them in a structured and effective manner.

The figure illustrates the OECD due diligence framework, which forms the basis for our systematic approach to responsible business conduct under the Transparency Act. It outlines the continuous process of embedding responsible practices, identifying and assessing risks, implementing measures, tracking progress, and communicating how impacts are addressed across our operations and supply chain.



Our Work with the Transparency Act

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

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 key risk overview – geography and industry

Company	Supplier category (procurement)	Direct supplier country	Production country / COO	Key risk factors	Our assessment and measures
WEB, WET, WER	Mineral extraction for electronic components	Primarily Norway and the EU, supplemented by a limited number of suppliers in China	Global	Risk in upstream value chains due to conflict mineral extracting with potential impacts on labor conditions, forced labor, child labor and financing of armed conflicts.	No serious incidents identified, but inherent risk is acknowledged. Due diligence, supplier follow-up and improved traceability.
WEB, WET, WER	Components / technical products	Primarily Norway and the EU, supplemented by a limited number of suppliers in China	EU, Asia	Complex value chains with limited transparency and increased risk related to labor conditions.	No serious incidents identified, but inherent risk is acknowledged. Ongoing supplier assessments and actions to improve transparency.
WEB, WET, WER	Logistics	Norway and EU	Global transport	Transportation across borders introduces risk due to complex logistics chains and multiple actors.	Risk is managed through established transport agreements with reputable logistics providers, as well as general oversight of the supply chain.

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.

Identified risk related to conflict minerals and follow-up measures

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. Our 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.

Activities and measures carried out in 2025

Company	Activities carried out in 2025
WEB, WET, WER	Information requests have been handled in accordance with the requirements of the Transparency Act. Two requests were received during the reporting year, both related to our activities in the downstream value chain and our connections to the defence industry.
WET, WER	We have continued to evaluate our existing suppliers through self-assessment questionnaires (SAQ). While the target of covering approximately 90% of total spend was not achieved during the reporting year, this remains an ongoing priority and the work will continue.
WEB, WET, WER	We have conducted our annual risk assessment based on geography and industry, of our most critical and largest suppliers.
WEB, WET, WER	We conducted our annual conflict minerals assessment, including mapping of relevant supply chains, and maintained close dialogue with suppliers linked to high-risk smelters to assess whether such risks were connected to our products. This work was challenging due to limited supplier responsiveness and incomplete data.
WEB	We have increased our focus on supplier evaluations to achieve a higher share of suppliers covered by due diligence assessments.

Action plan 2026

Company	Action plan 2026
Group level	We will update our existing Code of Conduct. The revised version will include more detailed requirements and additional elements tailored to both industry requirements and the company's needs.
WEB, WET & WER	Conduct our annual risk assessment of suppliers, with a focus on geographic and industry-specific risks.
WET, WER	We aim to increase the number of existing suppliers completing self-assessment questionnaires (SAQ), with the objective of maintaining coverage of approximately 90% of total spend.
WET, WER	We will expand our risk assessments to include a broader range of service providers.
WEB, WET & WER	We will further develop and strengthen our annual conflict minerals program, with the aim of achieving more accurate data and a stronger basis for more comprehensive mapping.
WET, WER	We will strengthen and further develop the integration of sustainability into our supplier audits, including social sustainability, as part of a more comprehensive assessment of our suppliers.
WEB	We will continue to expand our due diligence assessments to cover more suppliers.

Contact

For inquiries related to the Transparency Act, please contact our sustainability team at:

compliance@westcontrol.com

This report has been reviewed and approved by the Board of Directors of Westcontrol AS, Westcontrol Berget AS and Westcontrol Robertson AS, and provides an account of the Group's work in accordance with the Norwegian Transparency Act for the reporting year.

The version signed by the Board of Directors is available in the Norwegian version of the report.

