



Human Rights Report 2025

CEO Geir Håøy

Leading with purpose

In 2025, KONGSBERG continues its legacy of over 210 years by focusing on innovation, responsibility, and trust. Our history gives us pride—but even more importantly, it gives us direction and purpose. As we look ahead, our commitment remains clear: to develop technology that protects what matters most: people, societies, and the planet we all depend on.

As global challenges intensify—from conflicts to climate change—our commitment to developing technology which makes a difference remains resolute. We recognize respect for human rights as fundamental to our operations and strongly believe responsible business should set a positive example beyond our organization.

We see transparency and collaboration as powerful drivers of change. The Norwegian Transparency Act has strengthened dialogue across industries and value chains, opening doors to greater openness and shared solutions. By addressing challenges together, we can achieve far more than any single company acting alone.

As we move forward, we will continue to build on a strong foundation and to improve our systems, processes, and practices. Our ambition is to ensure that respect for human rights is not only embedded in our policies, but lived every day in decisions, partnerships, and innovation.

Our goal is clear and ambitious: to create a significant and meaningful impact for people, the environment, and the planet. By integrating human rights into the core of our business, we aim to contribute to a future that is safer, fairer, and more sustainable for generations to come.

Geir Håøy,
President & CEO



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Our Approach

Respect for Human Rights at the Core of Our Goals

Setting goals and standards for our human rights work has been and continues to be of strategic importance for KONGSBERG. We have integrated human rights into our governance, strategies, audit programs, daily operations, and due diligence assessments.

Our Human Rights Standards

Human rights are an integral part of our business, where we continuously work both preventively and reactively to ensure compliance with our external and internal requirements.

We are committed to respecting internationally recognized human rights, including the prohibition of forced labor, child labor, and the safeguarding of fundamental workers' rights, as set out in the UN International Bill of Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

Risk Assessment for Human Rights Impact

Each business area conducts risk assessments to identify actual and potential negative impacts on human rights. The goal of these risk assessments is to align our business with internationally recognized human rights and to conduct a comprehensive assessment of our entire value chain to better understand inherent, current, and potential risks for negative impacts on human rights.

We have conducted human rights impact assessments across all our business areas together with a wide variety of different functions. These assessments enhance our ability to apply a risk-based approach in managing both actual and potential risks. We take this work seriously and in 2025, an updated human rights risk assessment was part of the annual KPI's for the business areas.

Our Standards

Child labour

Diversity, inclusion and belonging

Environment and Climate

Fair reward

Health and Safety

Humanitarian Law

Minority Rights

Privacy

Resourcing and Mobility

Slavery, Human Trafficking and Forced Labour

Working time

[Read more about our standards on our website](#)

Governance

We have well established guidelines for our human rights work, anchored in our Code of Ethics and Business Conduct. The due diligence work related to human rights is integrated into our due diligence process for third parties, direct customers, suppliers and our audit programs.

Our routine for human rights work is adopted by the board and sets the standard for how we treat people. The routine underpins our commitment to responsible business by actively working to avoid causing or contributing to negative impacts on human rights. Governance and leadership are determined with the tone from the top at the corporate level, and the requirements are communicated down to the business areas through their business management systems.

We also extend fundamental principles in our human rights work routine to suppliers through our Supplier Conduct Principles (SCP). SCP is published on our websites and translated into six languages: English, Norwegian, Mandarin, Polish, Portuguese, and Finnish. Our human rights standards apply to all companies in the KONGSBERG group that are wholly or majority-owned and each business area is responsible for compliance and implementation of the human rights guidelines.

We have established channels for our employees as well as external parties to report and raise concerns, and we have a dedicated link for human rights inquiries on our website.

If negative impacts on human rights are identified, we take appropriate steps to address and mitigate them. In our supply chain, this is done either bilaterally with our business partners or in collaboration with other stakeholders, depending on our influence and the extent of our ability to impact.

Risk assessment

Data identification and collection

1

- Employees and own operations
- Supply chain: first tier suppliers and market representatives

Data analysis

2

- Analysis in excel which combines Kongsberg data and risk information from public, internationally recognized sources.

Risk overview

3

The output of the risk analysis is a overview of risk related to:

- Own operation and subsidiaries
- Suppliers and market representatives

Risk prioritization

4

- Risk verification workshop for input and prioritization
- This report provides overview of salient human rights risks and recommendations for next steps.

Risk assessment

5

Due Diligence Assessments

Our risk assessments for human rights are supported by the due diligence assessments we conduct. KONGSBERG conducts due diligence assessments of all our business partners in accordance with the OECD guidelines for responsible business conduct. The goal of the due diligence assessments is to identify, assess, reduce, and mitigate negative impacts on human rights. Our due diligence assessments are risk-based, and our business partners are subject to ongoing dialogue, periodic reviews, and, if necessary, audits.

When human rights risks are identified, they are assessed, managed, and/or remedied when required. Given the complexity and interconnection that human rights often have with regulatory compliance and integrity in general, our due diligence assessments include a wide range of compliance topics. Therefore, our due diligence assessments also include, among other things, anti-corruption and bribery, sanctions and export control regulations, as well as enforcement.

Risk Management

Significant risks are managed through our risk management process (Enterprise Risk Management Process), which is implemented in all our business areas. An important part of the process is that findings are communicated upwards to ensure a unified, holistic, and resource-strong approach from KONGSBERG. The board follows up on risk management and internal controls through their annual plan and agenda. This includes quarterly reviews of strategy and operational risks, key discretionary items related to financial reporting, and non-financial compliance such as human rights and climate-related risks.

Risk based approach





Our Business



Our Business

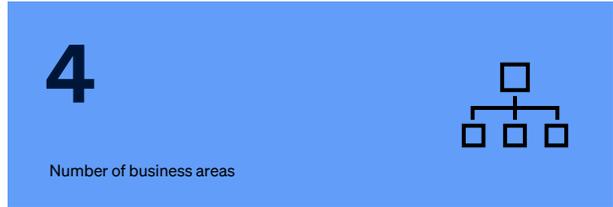
KONGSBERG is an international technology group that delivers advanced and reliable solutions that enhance safety, security, and performance in complex operations and under extreme conditions. KONGSBERG collaborates with global customers in the defense, energy, maritime, fisheries, renewable, and aerospace sectors.

Kongsberg Gruppen as a group employed 15,865 people in 2025. We have a presence in over 40 countries, but the headquarters and a significant part of the business are established throughout the Nordic region and are a significant employer with a large presence and support for local communities.

We have four established business areas: Defence & Aerospace, Maritime, Discovery, and Digital. Other activities include real estate, renewable energy, and corporate.

Through our activities, we create jobs – both directly through our own activities and indirectly through our supply chain. This contributes to promoting economic growth, welfare, and the development of people and communities. KONGSBERG is proud of the positive impact we have on local communities, but we also recognize the social responsibility that comes with the ability to influence.

Our human rights risk assessment conducted by the various business areas reveals a wide range of potential risks for negative impacts on human rights, and the risks mentioned in this report are a summary of these risks.



Supply Chain

The compliance due diligence of the supply chain is managed in accordance with our internal guidelines and is a risk-based approach that follows the OECD principles. The requirements are integrated into the business areas' supply chain and procurement processes.

KONGSBERG's mandatory requirements for suppliers are outlined in our Supplier Code of Conduct (SCP) and the business areas' quality requirements for suppliers.

Supplier assessment is managed through internal screening, country/industry risk assessment, supplier self-evaluation (IntegrityNext), and on-site supplier audits, with identified risks evaluated and managed as part of the procurement process.

Supplier compliance due diligence

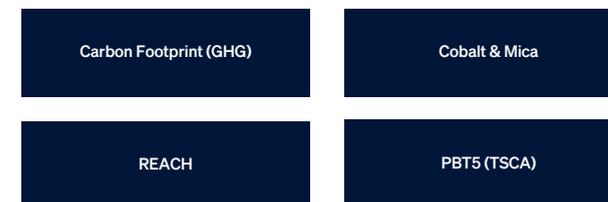


* Track implementation and results
 Communicate impact
 Escalation/remediation where appropriate

Environmental



Social



Governance



Supply Chain Highlights

KONGSBERG’s inherent risk assessment includes purchasing spend, country risk, and industry risk factors.

Total KONGSBERG purchases increased by **14%** compared to 2024, with the 100 largest suppliers accounting for **69%** of spend.

Direct product categories are defined as high-risk industries.

→ 75% of KONGSBERG’s purchasing spend are related to direct product categories (**3,577 suppliers**).

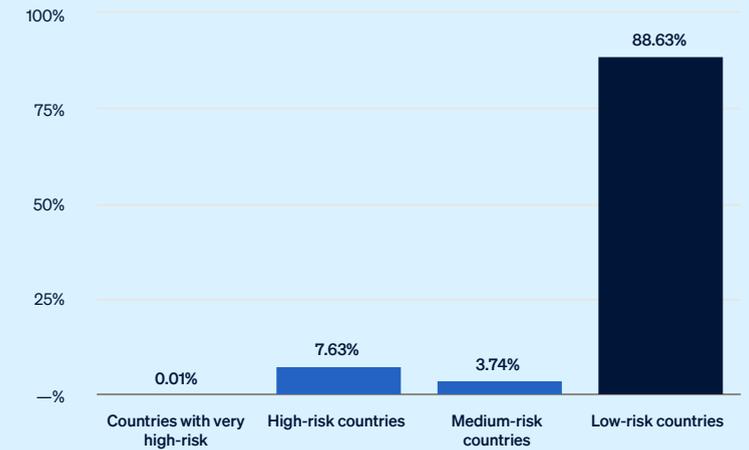
→ Direct product categories include **fabrications, machining, castings, forgings, hydraulics, electrical products, power products, reference systems, digital hardware/software, composites, cables, system components.**

The total number of suppliers is **13,824**, including **5,385 suppliers in Norway (39% of spend)**.

→ In 2025, an improvement project is underway to enhance the transparency of subcontractors through the use of digital tools and analyses.



Country risk based on human rights factors:



→ 2 suppliers in countries with very high-risk (**0.01% of spend**)

→ 1,918 suppliers in high-risk countries (**14% of spend**)

→ 888 suppliers in medium-risk countries (**6% of spend**)

→ 11,016 suppliers in low-risk countries (**80% of spend**)

Suppliers self assessment (IntegrityNext)

→ **3,752 suppliers** have been self-evaluated for human rights and labor requirements in IntegrityNext, representing 71% of spend, ahead of 70% target.

Supplier audits*

→ **165 supplier audits** completed globally in 2025, representing an increase of 23% compared to 2024 and ahead of 130 supplier audit target.

→ **42 supplier audits** completed in very high-risk or high-risk countries, representing an increase of 29% compared to 2024.

High risks identified based on the supplier's due diligence, including the supplier's self-evaluations (IntegrityNext) and supplier audits.

→ **36 high risks identified** related to HSE, ESG, and human rights, including 31 high-risks identified in high-risk countries.

→ **21 high risks** have been closed with corrective actions and 15 are under treatment (registered in Q4 2025).

→ **High risks** by theme: Human Rights & IntegrityNext red flags for follow-up (14), HSE (6), Supplier compliance screening (7), Export control and trade compliance (9).

KONGSBERG's Supplier Conduct Principles

→ 51 suppliers were approved by KONGSBERG in 2025 to follow similar documents as the Supplier Conduct Principles.

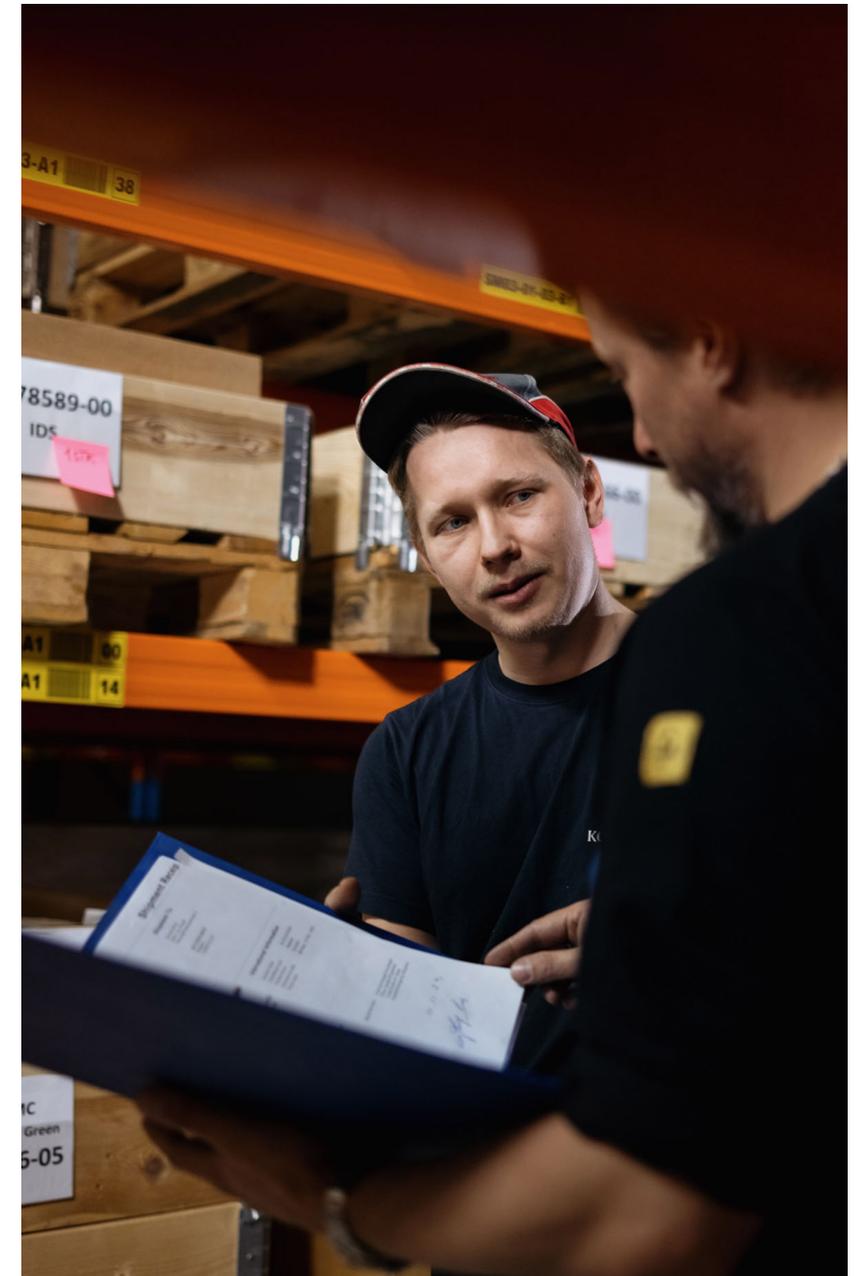
→ Three whistleblowing cases from suppliers were registered in 2025.

Low-value and high-volume indirect suppliers represent 5.5% of purchasing expenses (6,071 suppliers).

→ In 2025, KONGSBERG implemented improvements in the indirect procurement system Jaggaer, including a new user interface module to increase adoption and deployments in USA and Spain. Continued focus in 2026 to improve management of low value purchases globally.

*Supplier audits are conducted in accordance with the KONGSBERG defined demands coming from the following documents:

- Supplier Conduct Principles ([SUPPLIERS – KONGSBERG](#))
- Supplier Quality Requirements ([Kongsberg Maritime and Kongsberg Discovery Supplier Quality Requirements](#), [Supplier Quality Assurance Requirements - Kongsberg Defence & Aerospace](#))



Improvement of Human Rights in the Supply Chain

Human rights in the supply chain continues to be a major focus area, including supplier due diligence, HSE and training.

We have focused in 2025 on increasing our supplier due diligence in high risk areas including country, product, compliance, human rights, HSEQ, export control, security, sustainability and safety risk. Our supplier due diligence includes supplier self-evaluations through the IntegrityNext system, screening, supplier audits and supply chain governance. Identified risks have been managed according to our processes and business management systems.

In 2025, we communicated human rights, HSE and supplier due diligence requirements to suppliers in the following forums:

- KONGSBERG Agenda, Group Indirect Supplier Forum – June 2025
- Kongsberg Maritime Supplier Conference – October 2025
- Kongsberg Defence & Aerospace Supplier Conference – October 2025
- Group Logistics Forum - December 2025

In 2025, we have:

- Increased the number of self-evaluations from suppliers and audits (including human rights) in high-risk and very high-risk countries
- Conducted human rights training globally, including Norwegian Transparency Act training in multiple languages
- Increased the focus on safety in our due diligence with suppliers
- Continued the prioritization of HSE, ESG, and human rights in our due diligence, in collaboration with our suppliers

All of these areas continue to be a priority in 2026.



Kongsberg Maritime

Kongsberg Maritime is Kongsberg Group's largest business area and is a leading supplier of maritime equipment. Kongsberg Maritime has operations in many parts of the world and has equipment on more than 34,000 ships and installations worldwide. Kongsberg Maritime is a growing company and is expected to continue growing in 2026 and beyond.

In the company, the Compliance function is primarily responsible for the practical work on human rights. Together with Compliance, Supply Chain, HSE, and HR are the most central contributors to the human rights work in 2025.

EVP People and Business Support is the sponsor for the human rights work in the business area. In 2025, all employees at Kongsberg Maritime again had the opportunity to express their opinions on topics such as harassment, a safe workplace, modern slavery, and other elements through the follow-up survey to all employees.

Kongsberg Maritime conducted two location based Human Rights Impact Assessments in 2025.

For Supply Chain in 2025 we increased our supplier due diligence in high risk areas including supplier self-evaluations and supplier audits. Supplier self-evaluations through our IntegrityNext system increased by 35% for high risk countries (Brazil, South Korea, Malaysia, UAE, Indonesia, Nigeria) and were maintained at over 80% for China and India combined. 72 supplier audits were completed in 2025 which achieved our target, including 40 supplier audits in high risk countries. Supply Chain risks identified have been managed according to our risk management processes, with 14 risks identified related to human rights. Of these 11 have been closed with mitigation actions completed and 3 are open with action plans in place. Our supply chain audits include HSEQ, human rights, ESG and sustainability requirements according to our KONGSBERG Supplier Conduct Principles. We held our KM Supplier Conference in October 2025, where we communicated and reviewed our requirements with our strategic suppliers. Norwegian Transparency Act Training was completed in global locations including a China training video released on our webpage for suppliers to access.

Countries in operation

34



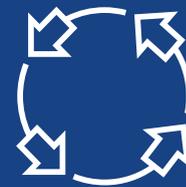
Number of employees

8,151



Suppliers

8,765



Our offerings to the maritime sector include:

Passenger Vessels

Our solutions prioritize safety, efficiency, and reliability in a segment with high capital costs and variable market conditions.

Offshore Energy

We support the industry with engineering expertise backed by our leading knowledge in the domain through digital technology and operational experience.

Merchant

We deliver efficiency and fleet management solutions that reduce operating expenses, creating a decisive advantage in a market driven by emission regulations.

Special Purpose

We find technical solutions for workboats, marine vessels, research vessels, and fishing boats that ensure efficiency and reliability.

Risk Management

Kongsberg Maritime operates in several countries with inherent risks of human rights violations and has a supply chain that also operates in countries with little recognition of human rights. Additionally, the maritime industry is an area with inherent risks of gender imbalance, work that poses health risks and, in some cases, life risks, as well as a dependence on raw materials such as steel, which involves mining at the lower end of the supply chain.

Our Goal

Our goal is to use risk analyses to identify the areas within our operations where there is the greatest risk of violations of international human rights and to compile this with data we have on our inherent risks. Together, this forms the basis for our work to identify focus areas to prevent or detect and remedy potential negative impacts on human rights.

Due Diligence Assessments

We conducted extensive due diligence assessments of our own operations within human rights in 2025.

The 2025 assessment includes, among other things, a survey sent to all employees as a follow-up of last years actions. It also includes two Human Rights Impact Assessment of our own operational locations. In addition, through our audits of our own operations in countries, the supply chain, and third parties, we have collected data on what can be defined as the most pressing risks for us.

The due diligence assessments are based on a combination of our established standard from KONGSBERG's directives and internal processes. We use several tools in our work to uncover possible risks, such as GAN Integrity, Compliance Catalyst 2, and Integrity Next. We also introduced a new tool, Sayari, enabling us to further understand the movements of goods and the underlying layers and potential risks of some of our Business Partners. Additionally, we make an assessment based

on cases that come into our case management system, in relation to category and location. We compile this data with data on country risk and categories for the type of work performed, also called industry risk, from Human Resources. Together, this forms a risk matrix for human rights in Kongsberg Maritime.

We will prioritize work at locations and with third parties that, based on our due diligence assessments, represent a high or very high risk.

Inherent Risk

At Kongsberg Maritime, we have an inherent risk that is considered high-risk in 13 countries. This is based on a compilation of several human rights standards, calibrated by both consulting firms and our Corporate Compliance. The number is consistent with 2024, even though we have assessed new locations as well.

Based on inherent risk only, we have certain third parties, such as market representatives or dealers, that represent an increased risk for us. These are representatives of Kongsberg Maritime who are located in countries/locations with an elevated risk of human rights violations. Of these, we have 6 third parties operating in high-risk countries.

Actual Risk

Based on the total sum of available data and due diligence assessments conducted, Kongsberg Maritime will focus on the following areas in 2026:

- Harassment/discrimination
- Operations in areas with an increased risk of human rights violations
- Supply chain in areas with an increased risk of human rights violations



Locations with potential
very high risk



Locations with potential
high risk



Locations with potential
medium risk



Locations with potential
low risk

The selected focus areas above are further supported by findings through whistleblowing cases, of which we had 54 in 2025, where some form of alleged harassment represents one of the main categories. We find that many of these cases are unsubstantiated after investigations, but the focus should remain high regardless. These findings are mainly in countries with low inherent risk, as expected, since the company's headquarters are in Norway together with the majority of workers. We also have findings in other areas that cannot be directly linked to human rights but are still relevant for determining focus areas for the way forward with our risk-based approach.

As a result of the findings in 2024 and 2025 we have conducted two internal human rights risk impact assessments on our locations. We have 27 findings, of which 5 are closed, and 22 that are still being followed-up as a result from these. The findings relate to areas such as fair wages, equal treatment across locations and labor rights. The reason for the open findings is that the assessment was done late in 2025.

A third assessment was planned in 2025, however it had to be cancelled due to unrest and security concerns in the area.

Locations which collectively pose a risk based on all available data have been designated for an assessment in 2026. The goal is to conduct 2 internal human rights audits over the next year.

Suppliers and third parties

Number of audits on third parties:

In addition to the audits conducted on our supply chain (see details below), Kongsberg Maritime has conducted three audits on other high-risk third parties. This accounts for audits on 10% of our third parties. In these audits, no actual or potential findings of human rights violations were found. These are third parties that undergo a thorough process before we enter into a partnership with them, so the lack of findings here confirms that the process works as intended.

In the audits of our supply chain, 72 audits were conducted in 2025, of which 40 were carried out in areas with high or very high-risk. In these, actual negative consequences or potential risks for negative impacts on human rights were found in 14 cases (11 closed, 3 ongoing).

Some of the findings were only improvement suggestions (6), while others constituted a serious deviation from the standard Kongsberg Maritime sets for its suppliers. Follow-up plans were created for these, and in some cases, the supplier was blocked until the deviations were corrected.

The findings varied from a lack of safety equipment for the supplier's employees to deviations in following our Supplier Conduct Principles and ensuring the flow-down of these requirements to their own suppliers. All findings are recorded in our systems, with a target date for closing the findings and a requirement for documentation of correction from the supplier.

Next year, we plan to continue our focus on human rights for suppliers, through supplier self assessments, reviews and audits.



Measures

At Kongsberg Maritime, efforts have been made to reduce the risk of human rights violations in several areas. We had no severe breaches of Human Rights in 2025:

- Although we have internal operations in several countries with inherent high-risk, all our employees and temporary workers have employment contracts that meet at least the legal requirements in the area and often exceed them. Kongsberg Maritime also has mandatory training for all new employees that includes a focus on living by our Code of Ethics and Business Conduct. We also introduced the use of an employee engagement tool in 2025, where employees can anonymously report their views on several factors which make up workplace environment, including safety, trust in our ability to take action and perceived satisfaction at work.
- Within HSE (Health, Safety, and Environment), work continues to register deviations, improvements, incidents, and "near-misses" in the Synergy tool. HSE has also had campaigns throughout the year to improve the focus on a safe working environment. The risk matrix has resulted in increased focus on certain types of risks employees can be exposed to, such as electrical work which has potential severe consequences. Stop Work is used by employees in situations that may pose a danger to life and/or health and has been used 146 times in 2025. The HSE function in the company continuously analyzes the reports that come into Synergy and works on measures to ensure a safe working environment for all our employees. Many employees work in shipyards or on board ships where there is sometimes insufficient safety and lack of satisfactory conditions. In these cases, employees are encouraged to communicate both to the customer and back to Kongsberg Maritime.
- We had 13 High Risk Incidents in HSE in 2025. These were mainly related to electrical work, which is why HSE launched a campaign on this type of work towards exposed

employees to increase awareness on risks and safe ways of working.

- Kongsberg Maritime follows the KONGSBERG Supplier Conduct Principles and requires that these requirements are passed down the supply chain. Within our supply chain, efforts are being made to ensure that all high-risk suppliers are required to register in IntegrityNext, as a self assessment on human rights. Overall 79% of Kongsberg Maritime suppliers were assessed in the IntegrityNext Human Rights, HSE and Anti-Bribery and Corruption modules, exceeding the 70% 2025 target. Communications took place with suppliers, reinforcing our requirements at the KONGSBERG Group Indirect Forum in June 2025 and the Kongsberg Maritime Supplier Conference in October 2025.
- In 2025 we suspended one agreement with a Third Party where we were unable to exclude the possibility of potential risk to Human Rights.

Expected Impact of Measures

The measures Kongsberg Maritime took in 2025 have had the following effects:

- More employees report unsafe working conditions, and these are then properly handled.
- In the supply chain, as well as with third parties, continuous monitoring of possible alerts/hits in tools indicating a change in the risk picture for Kongsberg Maritime is carried out. In addition, there is an audit program that is continuously evaluated throughout the year. Through audits, we will be better equipped to work proactively with gaps in the supply chain. At the same time, Kongsberg Maritime has a large number of suppliers, so proper prioritization of who should be audited is important.

- Findings made at internal locations may lead to changes in processes and regulations internally in 2026, as well as an improved working environment for employees.
- In 2026 we will continue the focus on ensuring all employees have the chance to speak up and raise their concerns.
- Kongsberg Maritime will also continue the work that has been started with training leaders and employees on an inclusive work environment and increased awareness of harassment and discrimination.
- In relation to our supply chain, we expect more findings as a result of our expanded work in 2025. These findings will be addressed through corrective action requirements from Kongsberg Maritime to the suppliers in the same way as this year's findings.

Remediation

- On the finding related to harassment and discrimination in the workplace, we have a slight decrease on percentages of cases in this category in 2025, but we will continue the focus with the measures described in 2026.
- We have launched several remedial measures, such as a company wide brochure on Anti-harassment, employee engagement tool which better equips leaders on following up their employees, and continued focus and training.
- Supply chain has increased its assessment in Integrity next, and have also followed up on all findings both through audits and in Integrity Next to ensure we close findings with our Suppliers.

Harassment and Sexual Harassment – progress made in 2025

Despite continued preventive work on harassment and discrimination, Kongsberg Maritime continues to find issues in this area. Therefore, several measures have been introduced to mitigate the risk in the company.

We continue our focus through training, employee engagement tools, speak-up campaigns and surveys. We also started the launch of a company wide brochure on Anti-Harassment in 2025. The plan is to roll this out to all locations in 2026, along with targeted communications on the effect of our Raising Concerns measures, to further build trust in the system.

The responsibility and ownership of this training are well anchored in top management to ensure a clear stance that we want a culture characterized by openness, inclusion, and belonging at Kongsberg Maritime.

Kongsberg Defence & Aerospace

Kongsberg Defence & Aerospace (KDA) is one of four business areas within the Kongsberg Group. KDA belongs to the defence and space industry and is Norway's leading supplier of defence products and systems for command and control, surveillance, space, tactical communications, remote weapon stations and missile systems nationally and internationally.

KDA is headquartered in Kongsberg, Norway, and consists of three divisions that are responsible for different product areas and services. KDA has a presence in 18 countries including majority-owned subsidiaries in which KDA holds over 50% of the shares. KDA has its largest presence in Norway, the USA, Canada, Australia and Lithuania.

This report covers KDA AS and our majority-owned subsidiaries. The due diligence assessment applies correspondingly to the subsidiaries that are subject to KDA's governance and frameworks. KDA works systematically with compliance with human rights and decent working conditions across the entire business. KDA has a holistic and risk-based approach regardless of location. KDA's goal in conducting due diligence assessments is to reduce the risk of potential negative impacts and stop actual negative impacts in our value chain.

KDA including several majority-owned subsidiaries is subject to reporting requirements under the Transparency Act and local obligations such as the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018. The reporting obligations and the explanation of these are incorporated in this report as well as the annual and sustainability reporting at group level.

Countries in operation

20



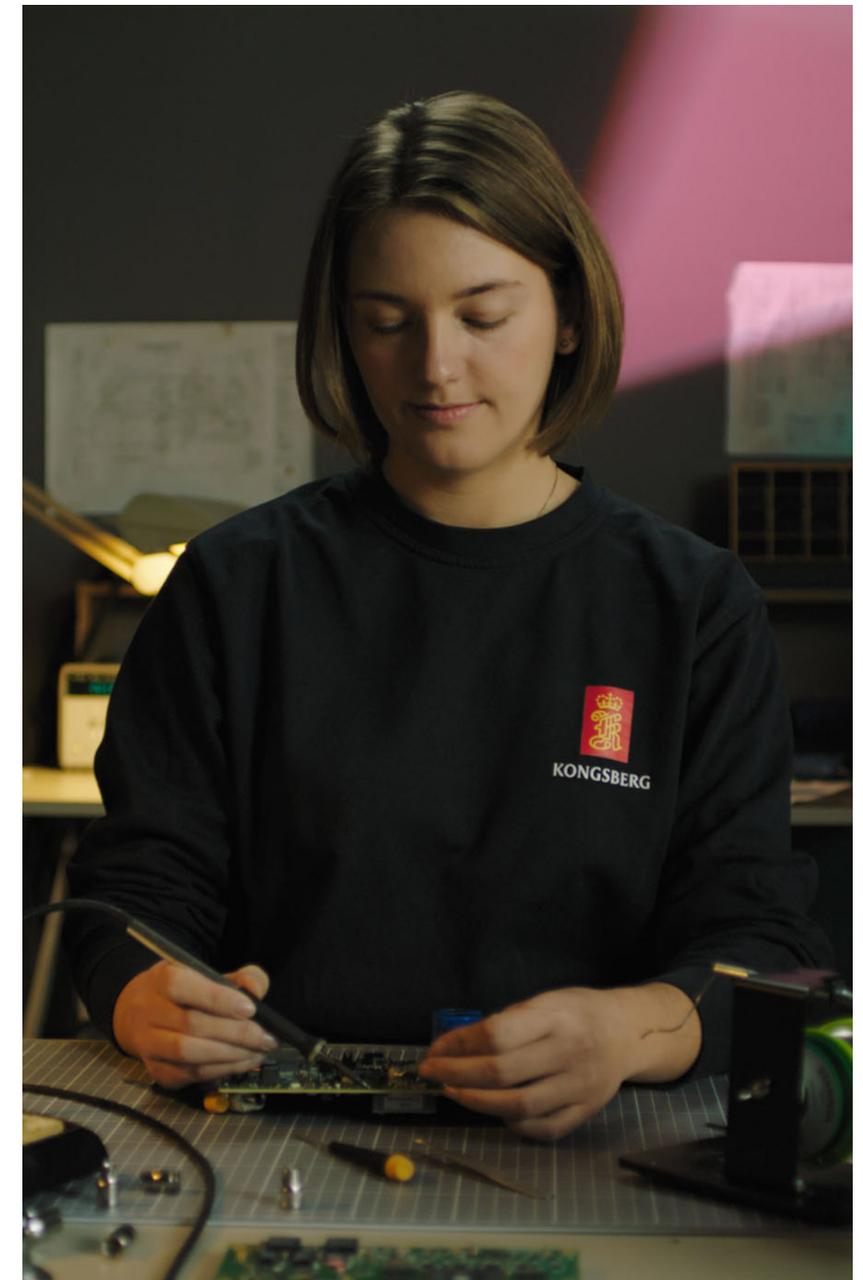
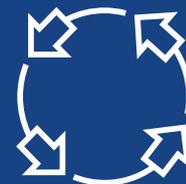
Number of employees

5,271



Suppliers

2,143



Risk Work

Organization and accountability

KDA has established responsible business conduct that safeguards human rights and decent working conditions in our value chain. The overall responsibility belongs to the CEO and the board, and Compliance has the operational responsibility by following up, coordinating and ensuring compliance in practice. Compliance in KDA is responsible for conducting due diligence assessments, advising, following up on measures and reporting to management and the board.

To ensure a holistic approach, KDA has established a multidisciplinary group with dedicated employees from different disciplines centrally. This contributes to better and more effective follow-up, anchoring and implementation of measures. There is also a network of dedicated resources from KDA's subsidiaries and divisions that function as local contact points ensuring better implementation, follow-up and reporting in their respective units.

Guidelines and management systems

KDA has established a strong framework that supports the purpose of running the company responsibly and promoting work with fundamental human rights and decent working conditions. The framework consists of documents such as our business ethics guidelines, Supplier Conduct Principles, policies, standards and processes in various disciplines. Including, but not limited to disciplines such as Compliance, Procurement, HR, HSE, Sustainability, Safety and Market and Sales, which contribute to interdisciplinary anchoring. These governance documents support the purpose of promoting fundamental human rights and decent working conditions throughout the company. The documents are reviewed and updated regularly to ensure continuous adaptation to applicable regulations, internal procedures and the company's risk profile.

KDA is also subject to Norwegian export regulations and the Norwegian Security Act. These laws play a central role in the establishment of KDA's framework and guidelines. KDA has obligations to conduct thorough assessments of the recipient, the use of defense equipment and risk analyses of all export licenses. Factors such as the protection of people and society are part of the analyses from both KDA and the authorities.

Reporting mechanisms and routines

KDA has established routines for reporting in line with the group's directive. In addition, KDA provides regular training and frequent communication on reporting globally for our employees and third parties. Further information and details for reporting can also be found in the annual and sustainability report.

Due diligence assessments

KDA's report includes a comprehensive description of the company's due diligence assessment process through the year 2025. The process is based on the OECD's six steps for due diligence assessments and is carried out with a holistic and risk-based approach. KDA's report presents the potential and actual negative consequences that have been identified and have the highest priority. Furthermore, it has been considered which potential or actual negative consequences have the most significant consequences in our value chain. The consequences that have been considered the most significant have been given the highest priority. The potential negative consequences that were identified were assessed in more detail in order to further map where the business has the most significant risk of negative consequences in our value chain



*Discrepancy in number of sites depending on the discipline's responsibilities

As part of the due diligence assessments, documentation was obtained from the business, suppliers, business partners and other associated connections. The documentation contained data from various tools, disciplines and approaches from both operational and management levels. The data base included, but was not limited to, reported deviations, sick leave, contracts, audits, welfare schemes, work-related injuries, training, working hours, notifications, supplier evaluations and signing of company guidelines. The documentation was used as the basis for all steps in the due diligence assessment. The results of the initial analyses identified potential and actual negative consequences in our value chain. The results identified discrimination, work-life imbalance and forced labour in the supply chain as the highest priorities.

In KDA's value chain, there is a risk that employees, suppliers or other business partners may experience discrimination based on gender, ethnicity, nationality, religion, sexual orientation or sex. By being a company that has presence internationally, there will be different cultures and norms that may conflict. KDA has implemented measures to reduce potential negative consequences.

KDA's measures have a risk-based approach and include investigations, audits, collaboration, training and communication. In addition to our existing measures, all individuals in our value chain can report incidents through our public reporting channel. This open access helps us identify issues quickly, enabling us to investigate and implement further corrective actions as needed.

Work-life balance has been identified as an inherent risk, especially during periods of high activity, rapid growth, or global operations. Factors such as varying time zones, frequent travel, and increased labor demands can impact employees. Through KDA's already established measures, there are opportunities for flexible working hours, hybrid offices and training of managers to identify and minimize employees who may be affected. In addition to this, new measures are regularly assessed. KDA's risk assessment for 2025 indicates that the company has three inherent risks that are a result of operating in an international defense company. Through continuous monitoring, strong governance, proactive measures, transparency and clear

commitments, assignment of responsibility and prioritization, KDA reduces the likelihood of the risk occurring.

Actual negative consequences and measures

A survey has uncovered incidents within various areas that can be considered to have directly or indirectly contributed to actual negative consequences for our employees, suppliers or other business partners through our operations, products or services.

The survey has identified actual negative consequences based on whistleblowing cases and health, environment and safety incidents that have been reported. All reported incidents are handled on an ongoing basis, as well as in light of the overall due diligence assessment and subsequent measures. In 2025, the number of notifications in the raising concerns channel has increased to 58 reported cases of different levels and topics. In 2024, there were 21 reported cases. The majority of the notifications reported in 2025 concern management and communication internally within the company, and are considered low risk in scope. There has been an increase in the number of cases in 2025, which indicates that the measures to raise awareness about the raising concerns channel that have been implemented during the year have worked. KDA has focused on measures such as courses for managers, better follow-up and increased communication and awareness for all employees about raising concerns. KDA will continue with focus on this also in 2026. In addition, 90 HSE incidents have been registered globally in 2025 in KDA's HSE reporting system. There are different levels of incidents that have been reported. There are 5 of these incidents that have been considered as incidents of greater magnitude. KDA reviews all reported incidents and implements measures to prevent recurrence. In 2025, the HSE reporting tool was further rolled out and will continue to be used in 2026. Ongoing priorities include raising awareness, improving communication, and providing training, especially on high-risk incidents and psychological safety, to reduce future incidents. In 2025, the focus on awareness, communication and training has been on high-risk incidents and psychological safety in the workplace. These measures have been a focus to reduce the risk and number of incidents that have occurred.

In 2025, one of our suppliers experienced the death of an employee while working at their location. The accident did not occur during the production of KDA's products. KDA has followed up the accident and plans to conduct an audit at the supplier to establish better internal routines, proper notification routines and further follow up on the incident.

Kongsberg Defence & Aerospace sine leverandører



Direct suppliers with potential very high risk



Direct suppliers with potential high risk



Direct suppliers with potential medium risk



Direct suppliers with potential low risk



Significant impact of negative consequences

In 2025, KDA assessed that 28 suppliers had a too high a risk to cooperation with them. The assessments include factors such as country risk, media findings, economy, product, quality and environmental standards, size of companies and other factors, working conditions and human rights. KDA strictly evaluates and regularly audits both potential and existing suppliers to minimize risks and prevent negative impacts in the value chain.

KDA's main suppliers are located in Scandinavia where the inherent risk of negative consequences is considered to be low.

KDA has employees in all over the world. In some countries where KDA operates, labor laws and working conditions differ from those in Norway.

In 2025, KDA prioritized strengthening employee rights and conditions globally. Key actions included updating employment contracts and handbooks, improving facilities, expanding parental rights, and converting temporary roles to permanent positions. This ongoing work will continue in 2026, aiming to reduce risks and enhance security and support for all employees.

Suppliers

KDA has 2,143 direct suppliers with a presence all over the world. KDA assesses its suppliers as low, medium, high, or very high risk.

Most suppliers are located in Scandinavia and the USA, which are considered low-risk countries. For higher-risk suppliers, KDA applies strict due diligence, including information gathering, background checks, audits, and close collaboration to mitigate potential risks..

Third parties

KDA has 33 active market representatives located in various locations. Market representatives are part of our business by operating on behalf of KDA. Their task is to represent the company in areas where KDA does not have its own offices or employees. Market representatives are considered high-risk business partners based on the fact that they represent the company directly to customers and authorities.

11 market representatives have been identified as potentially high risk. The majority of these are located in various countries in Asia. Inherent risks have been identified based on a combination of structural, geographical and regulatory factors. On international corruption indices, many Asian countries are measured as having a high risk of bribery, gifts and influence. These risks can have indirect negative consequences for human rights through these potential activities that may occur.

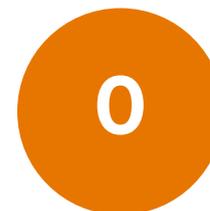
KDA has a comprehensive process to reduce the risk of potential negative impacts. This includes background checks by the Compliance team and external partners, training and interviews with business partners, and financial analysis by the finance department. Multiple internal departments contribute to the final assessment before entering into any agreements.

Throughout the business relationship, market representatives are subject to audits, regular reporting, and continuous monitoring. KDA provides additional follow-up as needed and requires all representatives, through contractual agreements, to operate in line with our values, guidelines, and requirements.

During 2025, eight market representatives were audited where human rights and labor conditions were parts of the audit. An agreement with one market representative was terminated in 2025.

In 2026, eight market representative audits are planned.

Kongsberg Defence & Aerospace's market representatives



Market representatives with potential **very high risk**



Market representatives with potential **medium risk**



Market representatives with potential **high risk**



Market representatives with potential **low risk**



Suppliers in Scandinavia accounts for 74%, and is a region with low human rights risk



64% of our suppliers are located in Norway, which is a country with low human rights risk



There are 28 potential suppliers who have not been recommended for partnerships

Actions

KDA is committed to continuously raising awareness, prioritizing training, and updating both internal and external procedures related to human rights and decent working conditions. This work is a daily priority, with increasing focus and ongoing improvements identified through our risk assessments. A structured work plan is in place, assigning clear responsibilities, regular meetings, and status updates to ensure sustained attention.

In the coming year, KDA will further implement HSE reporting tools at more locations and increase the number of supplier audits, with a particular focus on human rights and working conditions. Training and communication efforts will also be expanded to promote a holistic and well-informed approach. KDA will maintain and enhance the effective measures already in place.

Expected impact of measures

KDA expects these measures to have a broad impact, strengthening commitment and driving continuous improvement. The initiatives are designed to raise awareness and build competence across the organization, ensuring employees and key personnel clearly understand their roles and responsibilities. Additionally, these efforts aim to empower both internal and external stakeholders in our value chain to more effectively identify, report, and address any concerns or deviations.

By implementing additional tools, KDA expects more consistent and higher-quality reporting, as well as an increased reporting rate. This will improve our ability to analyze data and respond quickly to incidents or deviations. Ongoing updates to internal routines will help ensure they are effectively communicated and applied in practice, leading to more consistent compliance across all locations and cultures. Enhanced focus on human rights and working conditions in supplier audits is also expected to drive greater maturity and compliance, providing better

insight and follow-up on supplier risks. Promoting human rights and decent working conditions will remain an integrated and prioritized part of our business.

Remediation

KDA implements ongoing measures to address and remediate actual or potential negative impacts in our operations. We identify and assess significant risks within our value chain, taking corrective actions as needed. These measures are followed up until issues are resolved, and systems are strengthened to prevent recurrence.

Further anchoring in management and strengthened ownership

Continuous improvement

Strengthened supplier follow-up

Robust processes

Strengthened system support

Effective reporting

Increased awareness and competence

Cloud-based collaboration

In a collaboration between the Supply Chain and Compliance, a cloud-based tool has been implemented to generate a better and more correct risk profile for our suppliers. This is a collaboration project that consists of implementing systems, inviting suppliers, training personnel and updating the process, procedures and KPIs. This service is free for suppliers, increasing participation and providing us with better data for monitoring. It automates tasks, reduces workload for buyers, and improves data quality, including human rights evaluations. The goal is to boost response rates, enabling more comprehensive information and more accurate risk assessments of suppliers regarding human rights and working conditions.

Kongsberg Discovery

Kongsberg Discovery (KD) develops technology to ensure the sustainable management of marine resources, monitor climate change, protect critical infrastructure, and safeguard national security. Our technology and solutions are designed for offshore operations, fisheries, marine research, maritime operations, ocean-based energy production, and defense.

Kongsberg Discovery was established as a business area in 2023. As a business area, Kongsberg Discovery has conducted its due diligence assessments to map, assess and reduce risk to identify whether our business or supply chain leads to negative impacts on human rights or decent working conditions. Our goal is to prevent, stop and reduce any negative impact on our business activities for the people we employ, in our supply chain, with our business partners, and in communities and society incidentally.

Work on the risk assessment has been ongoing through 2025. Inherent risk to country, industry and presence from Kongsberg Discovery was the starting point for our assessment. The result of inherent risk was used as input for further assessment of actual risk.

The 2025 work with human rights risk in KD did not identify any severe human rights findings and these were our salient issues for 2025

Support and follow up our supply chain with focus regarding safe working conditions.

Ensure that our subsidiaries have implemented local measurements mitigating human right risks.

Provide our intermediaries with updated compliance training within the topic basic compliance, human rights, and conflict of interest.

For Supply Chain in 2025 we continued our focus on supplier due diligence including supplier self-evaluations and supplier audits. 17 supplier audits were completed in 2025 which exceeded our target. Risks identified have been managed according to our risk management processes. 1 Supplier was blocked following supplier due diligence oversight and actions taken. Our supply chain audits include such as HSEQ, human rights, ESG and sustainability requirements, with auditors undergoing more training on the audit topic throughout 2025.

Countries in operation

7



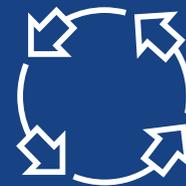
Number of employees

1,376



Suppliers

2,385



Risk Work

Inherent risks in Kongsberg Discovery's business model have been identified in relation to the development and distribution of our products through partners, the supply chain, and where we have legal entities and employees in countries with low scores on indices such as ITUC, EPI, CPI, DOI, FFFI WEF. Through analysis of identified inherent risks, we have identified the most prominent human rights risks our business potentially faces and affects.

KD has implemented heightened due diligence in our operations where necessary. Based on structured assessment, if a decision is identified to impact not only financial risk, but also risk related to conditions not in terms with our Code of ethics and business conduct and compliance, the decision is escalated to the highest management level in KONGSBERG. For these categories of decisions, the process requires a more detailed, in depth documented due diligence that follows the case for decision.

Our goal

Our objective is to identify actual or potential human rights risks arising from our business activities or supply chain. When Kongsberg Discovery identifies negative impacts on human rights or decent working conditions that we can prevent, halt, or mitigate, we will act in accordance with the established processes within our business management system. Identification of risk can be provided and detected through human right risk work and different tools and processes like risk reporting, HSE, internal and external audits and raising concerns both from internal and external 3rd parties.

Due diligence assessments

The initial due diligence assessments are based on inherent risks focusing on inherent high and very high-risk. This report has assessed KD related to our own operation (including legal entities and employees, raising concern and HSE incidents), KD supply chain and KD intermediaries. The inherent risk for KD 2025 was that we had one subsidiary in a country with inherent high-risk, KD have 16 intermediaries, 1 located in an inherent very high-risk country and 15 in inherent high-risk countries. KD had no suppliers in inherent very high-risk countries in 2025, however 66 were located in inherent high-risk countries.

When assessing inherent risks, we have looked at what operations we have in the country in question and what measures we have implemented to mitigate inherent risks.

Inherent risks

The identified inherent risks have been assessed by Kongsberg Discovery's process owners and subject matter experts in the areas to which the risk applies in relation to our context. The responsible function has evaluated inherent risks and identified which processes and requirements are implemented in our management system that reduce risk. Furthermore, we have assessed whether inherent risk constitutes an actual risk to our operations from the perspective of human rights. Identified actual risks are established in a risk matrix with defined goals and defined measures that are to be followed up and evaluated to see if mitigation measures produce the expected results. We have used the OECD method for the Due Diligence process and support measures.



Locations with potential
very high risk



Locations with potential
high risk



Locations with potential
medium risk



Locations with potential
low risk

Actual risks

No severe actual breaches of human rights or decent working conditions were found in 2025.

Business Partners

Due diligence assessments of our business partners are carried out in accordance with the defined process before they are established as intermediaries/distribution links for us.

The assessment is documented by defining business needs, obtaining information from third parties, compliance due diligence and obtaining an external report where identified risks are described. If the identified risk cannot be reduced to an acceptable level, the agreement will not be signed with the third party. If the identified risk can be reduced, Kongsberg Discovery will establish actions together with the third parties. Throughout the agreement period, third Parties are monitored and in the event of a single sale, they are subject for compliance screening. The portfolio of KD business partners is constantly screened in our compliance tool that provides notification if new information has been identified regarding the requirements defined in our contract (ABC regulations, adherence to Kongsberg Code of ethics and business conduct, OSINT information related to different topics). The process is documented in our Compliance Management System.

Approval of business partners in KD is elevated based on the risk the business partner presents for Kongsberg Discovery.

Kongsberg Discovery's business partners are audited on a regular basis, and the scope of the audit is based on the contract requirements and our Code of Business Ethics, which also includes our principles related to human rights.

Kongsberg Discovery Legal entities

Kongsberg Discovery has no legal entities in countries with an inherently very high-risk. Kongsberg Discovery has one fully owned subsidiary in Malaysia, which has high inherent country risk. In Malaysia, we have an office with 16 Kongsberg Discovery employees and 1 Kongsberg Digital employee.

KD Malaysia is fully integrated with Kongsberg Discovery's global compliance management system including Code of Ethics and Business Conduct, HSE policy, and anti-discrimination and harassment policies. The annual Code attestation with the obligation for employees to confirm that they have read and understood the code shows that KD Malaysia has 100% successfully signed the Code.

The Malaysia office has completed training on Compliance and HSE. In 2025, KD Malaysia, delivered 6 HSE observations and 3 HSE near miss cases in the global non-compliance system. Employees are included in the KONGSBERG career system in terms of pay, and working hours are regulated in accordance with the Employment Act 1955 (Section 60A), which regulates working hours, overtime and holidays. For our employees in high-risk countries, we ensure that they have standard employment contracts, working conditions, training, wages, benefits, etc. that satisfy local law or international standards, following the one that sets the highest requirements.

Supply chain

Due diligence of our supply chain is conducted before entering a contract through assessment of country risk and industry risk as well as other due diligence assessments. When approving a supplier, Kongsberg Discovery enforces requirements through the Supplier Conduct Principles. Suppliers with annual purchases exceeding NOK 500,000 must also be included in Integrity Next, where they are responsible for reporting on various elements, including human rights. Kongsberg Discovery is conducting audits of our subcontractors and in 2025 we carried out 17 audits. All audits of suppliers were in countries with low inherent risk, however due to other factors they were chosen for 2025's audit program. The 6 identified nonconformities are all related to safe working conditions and training. Safe working conditions are across international law, ILO principles and our own framework firmly considered as an important part of human rights. The findings are recorded and followed according to our audit process. The suppliers are responsible for and required to close the identified nonconformities within a reasonable time.

In 2025, Kongsberg Discovery did not have any purchases from subcontractors in very high-risk countries. The total purchases

from high-risk countries represent 0.3% of Kongsberg Discovery's total purchases in 2025.

Audits

Kongsberg Discovery has an annual audit program, including auditing our business partners. Audits of Kongsberg Discovery's business partners are selected through a risk-based approach. The criteria for selection are Corruption Perceptions Index, Human Rights Index, Category Products for Distribution, Category End Customer, Commission Payout, Sales Revenues and Total Risk Profile. In 2025, Kongsberg Discovery carried out 3 audits of its business partners.

In all three business partner audits performed, it was identified areas for improvement relating to flow down statement requirements of human rights standards in their supply chain. One of the business partners was asked to improve their statement of legal age for employment in their human right ethics management procedure. Two of the business partners are located in countries with inherent high risk and one in a country with inherent low risk.

The audit findings are followed up in the internal process, Auditing Management and audit execution.

Raising concerns cases

Raising concerns cases are delivered to KD by usage of the CMS or the web portal and the cases are registered in the CMS. Investigation of raising concern cases have been centralized to corporate level with a team assessing the reported cases, defining the level of the cases and including the right stakeholders according to the defined risk level. The two highest risk levels cases are managed by the corporate team. For 2025 KD received 22 raised concerns, which is an increase of 19 received cases compare to 2024.

The reported raising concerns was related to 4 countries with inherent high risk and 4 countries with inherent low risk.

The categories of reported concerns are distributed between 12 different categories.

44,44% of the cases were considered substantiated.

7 of the reported concerns are not related to human rights, the other 15 case are related to categories as harassment, respect and fair treatment, conflict of interest, labor rights and other. Out of the 22 reported cases, 21 of them are closed in January 2026.

Based on the reported Health, Safety and Environmental status for KD

In 2025, KD received a total of 88 HSE-related cases from employees. Of these, 5 were classified as Total Recordable Incidents (TRI). All TRI cases were reported by employees in Norway and required medical treatment. All incidents were categorized and handled in accordance with internal processes. All cases for 2025 have status closed. None of the TRI cases were related to human rights breaches. In addition, KD received 76 first-aid cases (FAI), none of which required medical treatment by authorized health personnel. Overall, 88 HSE cases (TRI and FAI) were recorded in KD's HSE system for 2025, and none resulted in absence from work.

Further, KD registered 125 near-miss events and 669 observations for potential improvements during 2025. All reported cases were managed in accordance with internal processes and documented in the HSE reporting system.

The TRI rate for 2025 was 1.844, showing a clear improvement compared to 4.601 in 2024. This positive trend indicates that ongoing efforts related to reporting, follow-up, and near-miss management are contributing to fewer injuries among KD employees.

KD did not receive HSE report related to external incidents in 2025.

Actions

Business Partners

Regarding business partners, Kongsberg Discovery has offered and conducted human rights training for some of our partners. The training will be extended in 2026. Human rights consideration has been included in the audits of our business partners and is a part of our integrated process. Compliance has been interacting with our business partners through compliance training, audits and onboarding and renewal of business partners. As a result of the 2025 compliance due diligence process, five business partners were rejected or not renewed based on identified risk.

KD will in 2026 provide our intermediaries with updated basic compliance training, human rights training and conflict of interest training, all will be provided as e-learning with option for follow up.

Legal entities

Regarding Kongsberg Discovery's inherent high-risk legal subsidiary in Malaysia, previous identified human right risks are followed up, and internal audit could be used to provide assurance of compliance. By ensuring compliance with our management system, process owners and stakeholders will be able to uncover actual risks in relation to human rights so that we can actively prevent, stop and reduce any negative impact.

Kongsberg Discovery's management system is constantly improving to be able to meet requirements and always represent our best practice. To provide assurance of compliance, central functions will provide our subsidiaries with training, support, assessments and audits with focus on human rights.

Supply chain

One area Supply Chain will continue to strengthen is the risk-based approach through its due diligence steps and supplier audits, including a focus on human rights and training. The

focus for 2025 was to strengthen the auditor skills by providing training to auditors throughout 2025. Supporting training was provided for both internal and external use on the Kongsberg.com web page ([Conducting business with us - Kongsberg Discovery](#)). The training goal is to increase the awareness of the supplier due diligence based on the Norwegian transparency act.

Supply Chain is also looking to improve the knowledge of human rights and the transparency act with our suppliers through audits, information campaigns and training in 2026. Auditing of our suppliers will continue in 2026 according to a defined program. Supply chain will work together with our suppliers to strengthen the focus on safe working conditions by providing campaign material and training of the topic.

Raising concerns cases

In 2025 KD launched a speak up and raising concerns campaign and survey in January. The survey provided valuable information where 1/3 of the employees provided anonymous input. The same survey will be re-launched again in Q1 2026. Continued focus from Compliance and management has also taken place, to provide training and presentation material for all managers through the year by Managers e-guide and compliance moment "how to report a concern".

The increase of raised concerns cases through our reporting channels are considered positive, and the status of closed cases provide information that 44% of the reported cases were substantiated. KD assess the number of received raising concern cases for 2025 to be at a more accurate level, considering the size and headcount of the business area, than for previous years. The conclusion of the closed cases also provide support that the right concerns are raised. Most cases are reported from Norway, but cases were received from 7 other countries as well.

The continual focus of the topic needs to be emphasised in the organization with the support of the top management. The planned survey in Q1 2026 will again provide an output of information for analysis. We see the need to keep a strong focus on informing about the raising concern when an employee observe or experience elements that should be informed by raising a concern.



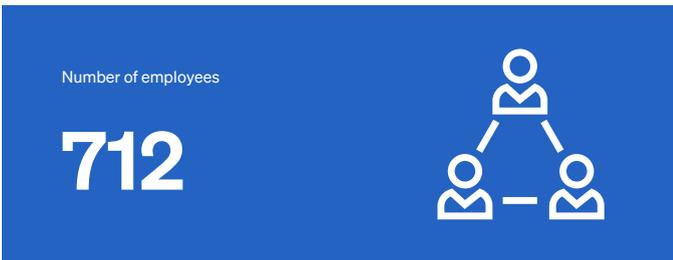
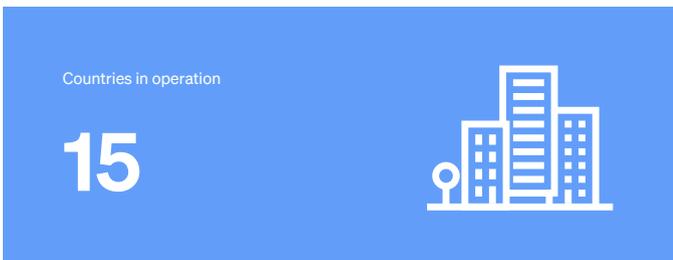
Kongsberg Digital

Kongsberg Digital is an industrial software company delivering digital solutions that support safer, more efficient, and more sustainable operations for heavy industry. KDI's core activities include the development and delivery of industrial software, software-as-a-service (SaaS) solutions, digital platforms, consultancy, and support services.

The company's business model is technology and data-driven, with increasing use of advanced analytics and artificial intelligence (AI) to enable data-informed decision-making across industrial value chains.

KDI operates in 15 countries and is headquartered in Norway. The company has subsidiaries in Norway, India, China, and the United States, as well as FutureOn operations in Norway, United States, United Kingdom, and Brazil. All subsidiaries operate under the same governing documents, internal requirements, and Business Management System (BMS) as the headquarters, ensuring a consistent approach to governance, compliance, and human rights across the organization.

As of 2025, KDI employed 712 permanent employees. The workforce is primarily located in Norway and India followed by the United States and China. The remaining employees are distributed across several countries, each representing less than 10% of the total workforce. KDI's employees are highly qualified and primarily work in an office-based environment.



Risk Management

Our Goal

Kongsberg Digital is committed to conducting business responsibly, transparently, and in alignment with internationally recognized human rights standards, contributing to sustainable, ethical, and people-centered operations across its value chain.

KDI recognizes that human rights due diligence is a continuous process. In 2026, the company will further strengthen its approach through targeted supplier audits, enhanced privacy-by-design practices, reinforced diversity and inclusion initiatives, and continued development of responsible AI governance.

Due diligence

Kongsberg Digital's human rights due diligence framework is supported by established governance structures, directives, and tools that guide the identification, assessment, management, and follow-up of human rights risks across the company's operations, supply chain, and business relationships.

KDI applies a risk-based approach to human rights due diligence, ensuring that resources and efforts are focused on areas with the highest risk exposure. All customers, suppliers, and other third parties undergo due diligence prior to engagement and throughout the business relationship. Where risks are identified, KDI assesses whether such risks can be prevented or mitigated through appropriate measures.

The Human Rights Risk Assessment 2025 performed in Kongsberg Digital was conducted in accordance with OECD methodology and in compliance with the Norwegian Transparency Act.

Inherent risk

Based on its operational footprint and business model, KDI's most significant human rights risk areas are related to mental health and employee wellbeing, non-discrimination, equal

opportunity and diversity, speak up culture, and privacy. In addition, the presence of suppliers and business partners in higher-risk countries increases the importance of solid due diligence, monitoring, and supplier oversight. These risks are assessed and managed through KDI's Human Rights Risk Assessment, governance framework, and continuous improvement processes.

Inherent country-level human rights risks were identified in 7 countries, where Kongsberg Digital has supplier relationships.

All of these are characterized by high political risk. From a social risk perspective four countries are classified as very high risk, two are high risk and one is medium risk. From an environmental risk perspective, one country is assessed as very high, one is classified as a high risk and the remaining five are medium and low risk.

These relationships are subject to enhanced controls, including stricter contractual requirements, targeted monitoring, and escalation procedures.

Consistent with the UN Guiding Principles and OECD Guidelines, our conclusion is framed in terms of risks to people: while systemic risks cannot be eliminated entirely in global value chains, KDI demonstrates reasonable prevention and mitigation through supplier screening, ongoing monitoring, and escalation processes. Where risks cannot be adequately mitigated, KDI may suspend or terminate the relationship. If KDI causes or contributes to harm, we will provide or cooperate in remediation in line with international standards.



Locations with potential very high-risk



Locations with potential high-risk



Locations with potential medium-risk



Locations with potential low-risk

Salient Human Rights Risk - Actual risk

Kongsberg Digital has identified a set of salient human rights risks across its own operations, supply chain, and business relationships. These risks reflect the nature of our business as a technology company, our global footprint, and the jurisdictions in which we operate or source services:

- Exposure to suppliers and partners in higher-risk jurisdictions.
- Risks of forced labour, human trafficking, and child labour in the supply chain.
- Privacy, data protection, and responsible use of artificial intelligence.
- Mental health and employee wellbeing.
- Non-discrimination, equal opportunity, and diversity.

Raising Concerns

KDI encourages all employees and stakeholders to report any potential ethical concerns or misconduct.

KDI has an effective and reliable whistleblower channel, providing a secure and confidential way to raise concern without fear of retaliation. It operates independently, is easy to access, and ensures that all reports are handled promptly, fairly, and in accordance with legal and ethical standards.

KDI believes that creating an environment where people are comfortable raising concerns enables openness, which can lead to improved business performance and supports demonstrating KDI's values.

In 2025, a total of 11 concerns were raised at KDI. None were related to human rights issues involving suppliers. All cases were investigated and closed within the same year.

Privacy & AI

As a software-as-a-service (SaaS) company, Kongsberg Digital processes personal data relating to both employees and customers, making the protection of privacy and personal data a core human rights priority.

The company's main human rights risks are therefore also linked to how personal data is processed, secured, and used throughout operations and products. Kongsberg Digital approaches privacy governance from a global perspective, ensuring compliance not only with GDPR, but also with other applicable data protection laws.

In relation to Artificial Intelligence, Kongsberg Digital has conducted an AI ACT Impact Assessment and evaluated potential human rights risks related to AI use. Based on this assessment, mitigations have been implemented, including contractual terms and responsible AI guidance. KDI actively prioritizes the responsible development and application of AI and continuously works to identify, assess, and mitigate any fundamental rights risks that may arise from the use of AI technologies.



Supply Chain

Kongsberg Digital applies compliance due diligence, risk management and follow-up of the supply chain as the main framework for assessing third-parties.

The due diligence requires supplier screening, self-assessments against the Supplier Conduct Principles, country and risk evaluations, and, where relevant, audits and follow-up actions.

Identified risks are addressed through mitigation measures, escalation processes, and, where necessary, remediation or disengagement, ensuring that suppliers meet KDI's requirements for responsible business conduct, including respect for human rights.

The company uses IntegrityNext, Compliance Catalyst 2, and GAN Integrity to collect and manage information about its suppliers.

KDI's supply chain is primarily service based, with a significant share of expenditure related to software and professional services. Based on the information assessed, the human rights risks identified for these suppliers are similar to those identified in KDI's own operations. Suppliers providing software and consultancy services are assessed as presenting the most significant human rights risks for KDI, as these risks are closely linked to core business activities and are therefore difficult to fully eliminate.

Country Risk

In 2025, 90,7% of the suppliers with the highest amount of expenditure are in low- and medium-risk jurisdictions.

A limited number of suppliers operate in seven higher-risk countries. These relationships are subject to enhanced controls, including stricter contractual requirements, targeted monitoring, and escalation procedures.

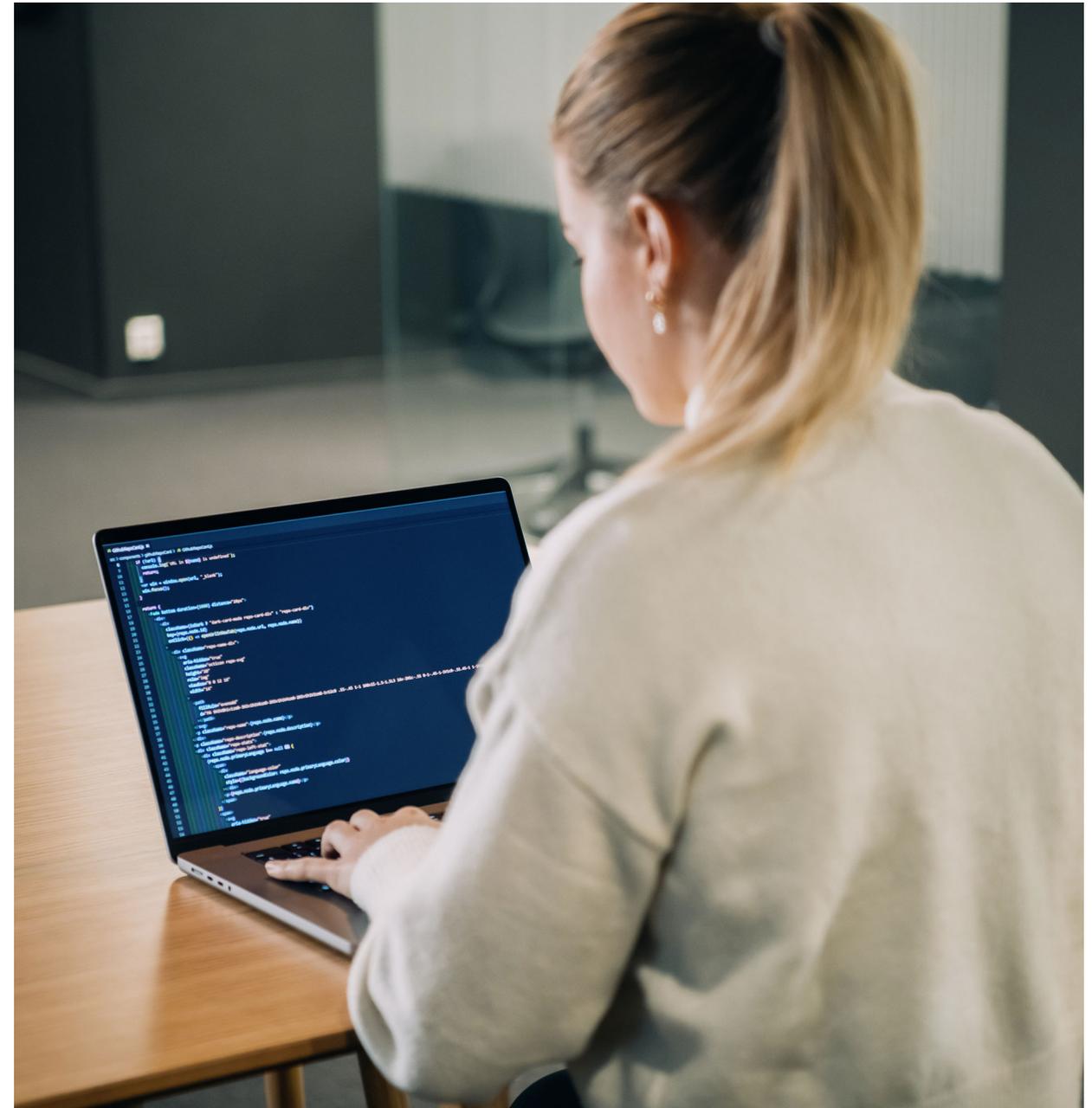
Main supplier: Microsoft Norge AS

Microsoft Norge AS is a supplier of computer software to all Kongsberg companies.

As our main supplier of computer software, this is the supplier that handles the greatest human rights risks on behalf of Kongsberg Digital.

In accordance with the principle of largest user, this framework agreement is administered centrally for all KONGSBERG business areas.

In its 2024 report under the Norwegian Transparency Act, Microsoft documents an active management of its human rights risks through a structured governance framework, a comprehensive compliance program, targeted training for employees and suppliers, engagement with stakeholders, grievance mechanisms for handling complaints and non-conformities, and ongoing measures for continuous improvement.



Actions

Key Actions Implemented in 2025

- Integrated human rights into quarterly management review meetings and ERM processes.
- Expanded supplier monitoring through IntegrityNext.
- Conducted 18 audits, including 3 with human rights scope.
- Launched mental health awareness program.
- Strengthened global HR processes, including pay equity reviews and leadership training.
- Enhanced privacy governance with AI risk assessments and updated Data Processing Agreements.

HR management and training

During 2025, Kongsberg Digital strengthened leadership practices, people processes and organizational structures to support fair treatment, consistent management, and improved employee engagement. Key improvements include:

- **Leadership development:** A dedicated leadership gathering was held to support knowledge-sharing and strengthen management capabilities. Digital learning modules for leaders were introduced, and regular leadership briefings were established to ensure preparedness for company updates.
- **Career framework and organizational clarity:** continuous improvement in career paths and overall role clarity across the organization. These efforts support more predictable development opportunities and a more consistent understanding of roles and expectations.
- **Global HR processes:** Performance and compensation review processes continued to mature and became more embedded in daily leadership routines. This contributes to more consistent and well-documented people's decisions globally.
- **Employee feedback and engagement:** The importance of anonymous employee feedback was reinforced, highlighting raising concerns channel and speaking up culture. This supports visibility and provides useful organizational insight that can guide ongoing discussions about the working environment.
- **Learning and development:** Implementation of an internal learning platform, offering modules on communication, collaboration, leadership, compliance, and other relevant skills.

Auditing our operations

- In 2025, a total of 18 audits of Kongsberg Digital were carried out, of which four were external audits conducted by third parties.
- Twelve of the audits included ISO 45001 (Occupational Health and Safety Management) in scope, and three of these also covered human rights specifically.
- Both standards are relevant for the assessment of human rights under the Norwegian Transparency Act.
- There were no high-risk audit findings related to human rights and health, safety, and environment (HSE).

In 2025, human rights were included in the scope of selected audits, and no actual or potential breaches were identified.

[Policies and procedures](#)

[Training and awareness](#)

[QHSE](#)

[Human rights included in the management's review](#)

[Due diligence](#)

[Control and monitoring](#)

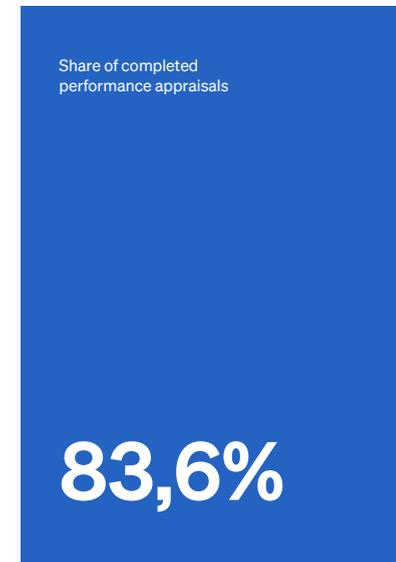
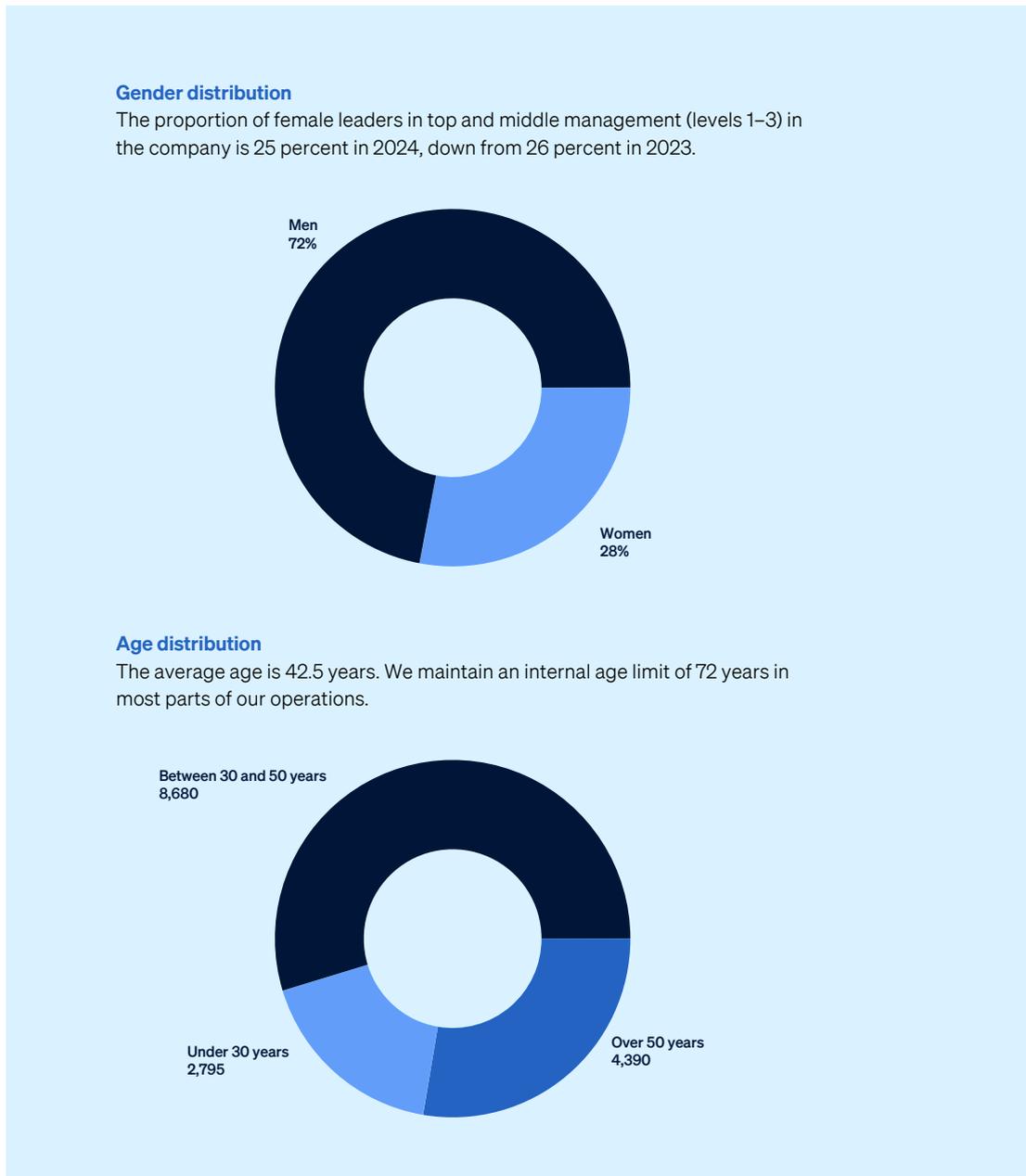
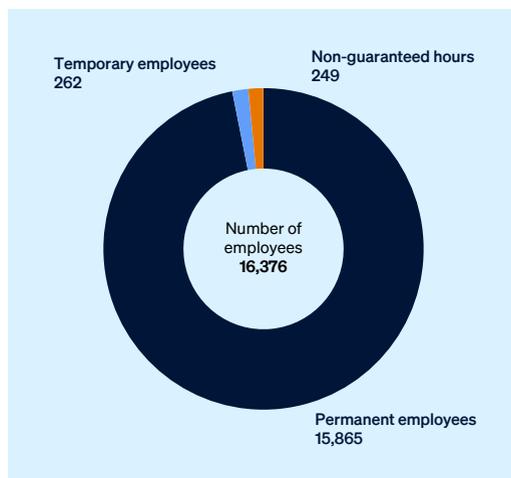
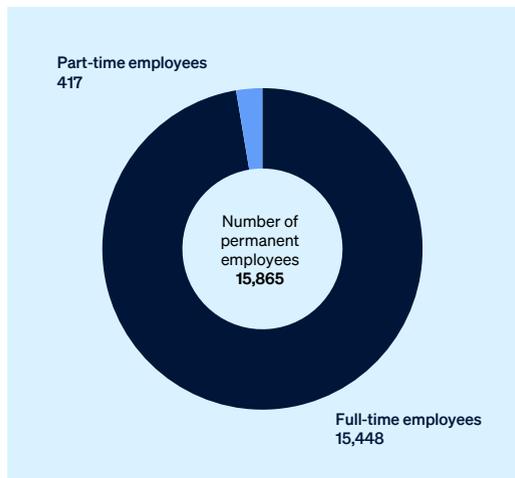
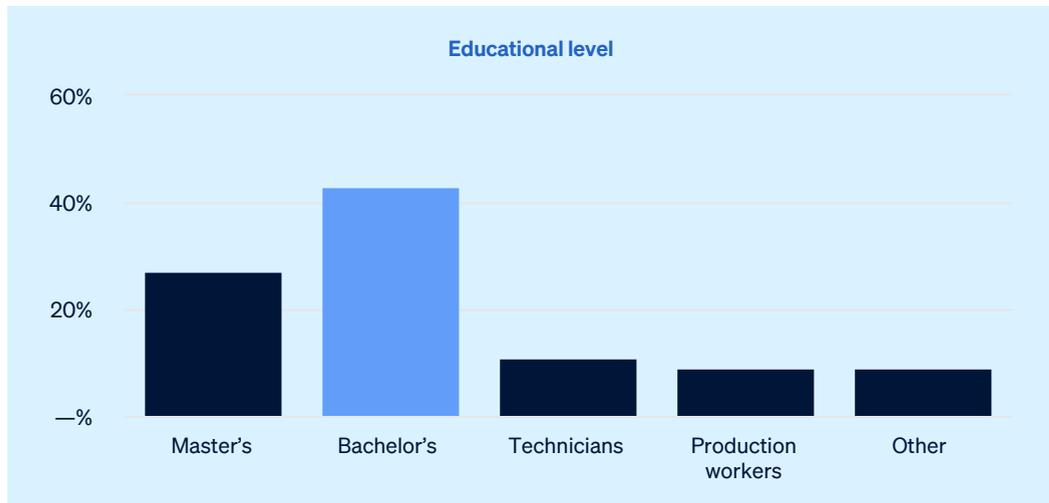
[Investigations and inspections](#)

[Analytics and reporting](#)

[Continuous improvement](#)



2025: Achieved Goals



Health and Safety

Actions planned in 2026

Kongsberg Maritime and KONGSBERG will continue the global roll-out of the HOP principles across the organisation. The companies will also continue to communicate that all employees and contractors working for both Maritime and KONGSBERG have both the right and the mandate to stop any work that poses an acute threat to life or health. Another important action is the review of the HSE organisation, competence and training registers, and the verification of the robustness of these processes. The companies will also continue identifying and reducing all operational routine tasks with high risk, and update our processes for reporting contractor incidents. Furthermore, the companies will review minimum requirements related to training of contractors and suppliers.

Targets and Metrics

We have a "Vision Zero" ambition related to health, safety and environment: no employees, customers, contractors, partners, or the environment should be involved in accidents and incidents. This target aligns with the objective of the Directive for Occupational Health and Safety, addressing identified impacts, risks, and opportunities related to health and safety. By evaluating our progress towards these targets, we assess the effectiveness of our actions in mitigating identified health and safety impacts and risks.

Target	Measured by (metrics)	Status 2024 (base year)	Status 2025	Goal 2025	Connection to IROs
Reduce total recordable injuries (TRI) in 2025	Total recordable injuries per 1 million hours worked, extending first aid ¹	2.24	1.45	no goal defined	Impact and risk related to safety
Increase focus and awareness to high-risk incident (HRI) rate	High-risk incidents per 1 million hours worked ²	0.65	0.71	no goal defined	Impact and risk related to safety
Reduce sick leave globally	(Total days hours to absence / Total available working hours) × 100	3.4%	2.7%	no goal defined	Impact and risk related to safety
Reduce sick leave to less than 3.7% for 2025 for operation in Norway	(Total days hours to absence / Total available working hours) × 100	4.0%	3.5%	3.7%	Impact and risk related to safety
Ensure that at least 75% of reported HSE cases are handled within deadline in 2025	Percentage of reported HSE cases that are closed within the defined deadline ³	69%	85%	>70%	Impact and risk related to safety

Comment: Our reporting system for HSE incidents covers all employees and non-employees.

¹ TRI includes injuries beyond first aid.

² The HRI rate is based on 20 incidents in 2025.

³ Normal deadline is 14 days, which may be adjusted depending on the nature and complexity of the case.

Health and safety metrics

	Status 2025
The percentage of own workforce covered by health and safety management system	100%
The number of work-related fatalities, including own workforce and other workers on our sites	0
The amount of recordable work-related lost-time injuries for own workforce (LTI)	41
The rate of recordable work-related lost-time injuries, per million hours worked, for own workforce (LTI)	1.45
The number of cases of recordable work-related ill health for own workforce	Cases of work-related illness are followed up at the individual level. We are currently working on reviewing the reporting processes.
The number of days lost to work-related ill-health, injuries and fatalities for own workforce	422

Process of setting targets

The Group's overall targets and strategic work are based on risk assessments and collaboration with the business areas through the Group HSE Committee. Group management has the overall responsibility for HSE across the Group, including setting overarching targets and priorities, and following up performance, challenges, opportunities, accidents and high-risk incidents. The Board of Directors holds the ultimate responsibility for overseeing and reviewing the targets.

Progress towards targets

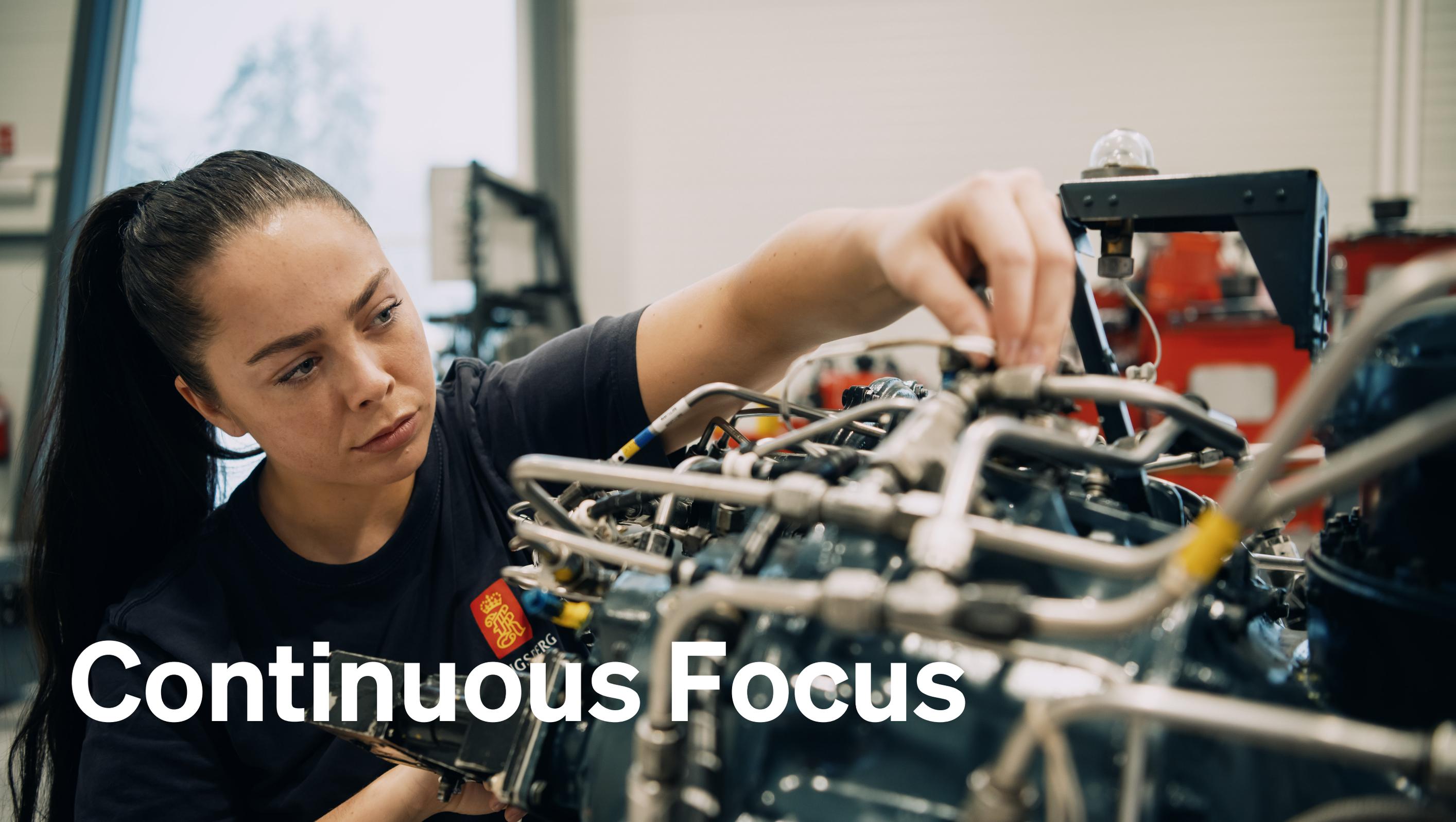
The TRI rate decreased in 2025 due to a reduction in the number of injuries. The majority of injuries were classified as minor, with 39 classified as medium severity and two as severe. Our underlying injury statistics have improved and are now at their best level since 2016. We have identified root causes and implemented strategies to reduce the severity of our incidents. We maintain additional focus on high-risk incidents (HRI) due to the elevated risk and damage potential. This contributes to protecting both people and the environment from serious incidents. The HRI rate is gradually increasing due to improved reporting and increased awareness.

Global sick leave has decreased from 3.4 percent in 2024 to 2.7 percent in 2025. Sick leave in Norway is better than the target, improved from 4 percent in 2024 to 3.5 percent in 2025. All business areas perform better than the average in Norsk Industri. Our employees reported a record number of HSE observations and improvement suggestions in 2025, and 85 percent of all reported HSE cases were handled and closed within the deadline. The target is more than 75 percent. All TRI and HRI incidents and sick leave results are reported and followed up in accordance with our procedures. HSE status reports are distributed to Group management and the Board, as well as other leadership teams and employees.

Dialogue with Stakeholders

Stakeholders	Why we engage	How we engage	Prioritised topics	Outcome of engagement
Employees	To create an understanding of our employees' needs and expectations, to ensure that their interests are taken care of, to inform about the strategic goals of the organisation, and facilitate for high performance and well-being. Nurture a value based culture. Secure a competent workforce that contribute to our growth ambitions.	Regular performance dialogues, employee surveys, townhalls, team building events, development initiatives, collaboration in various arenas, recruitment activities towards students and other potential employees.	Work-life balance, purpose driven company culture, flexible working arrangements, health and well-being, diversity and inclusion, equal opportunities, and responsible business conduct.	<ul style="list-style-type: none"> Monitoring of employees' well-being, and motivation through performance dialogue and engagement surveys Investment in learning management system and HMS system Offer flexibility to ensure a good work-life balance Focus on diversity and social responsibility in recruitment Summer project and summer jobs for students Affected communities identified as material topic Creating a thriving workplace is one of the focus areas of KONGSBERG's strategy
Shareholders/investors	To communicate specific, regular, and consistent information about our company's activities that support our shareholders/investors in taking informed decisions.	Dialogue through stock exchange disclosures, press releases, general assemblies, presentations and one-to-one meetings with both investors and analysts. External information on our website, such as annual reports, quarterly reports, and company presentations.	Climate and environment, supply chain, cybersecurity and governance.	<ul style="list-style-type: none"> Setting a SBTi climate target Expanding our Cyber Security Center
Governments	To understand and impact regulatory frameworks affecting KONGSBERG.	Direct dialogue through meetings and other arenas, public hearings, and public debates at events and in media.	Regulations and framework conditions, including technology development, market access, education, energy transition, and others.	<ul style="list-style-type: none"> Continuously strengthening ESG reporting and developing first CSRD aligned report for 2024 EU Taxonomy reporting Interaction and collaboration with Norway's leading trade unions, business organisations, NGOs and think tanks Product development Participation in EU research programme and access to funding
Customers	To create a good understanding of our products and services, capabilities, and deliveries, and to build good relationships, partnerships, and trust.	Regular live and digital meetings with customers. Exhibitions, conferences, and other industry-specific arenas.	Technology, system integration and product offerings. Look after customer needs and deliveries.	<ul style="list-style-type: none"> Product development that focuses on energy saving, electrification, and digitalisation.
Suppliers	We engage with our suppliers through daily business interface and strategic relationships to ensure a good and productive collaboration, working towards responsible supply chain.	Direct engagement through meetings, webinars, site visits, and conferences.	Responsible supply chain, including quality, health, environment, safety, human rights, compliance, security and export control	<ul style="list-style-type: none"> Global deployment of risk-based supplier due diligence, including self-assessments and audits Supplier engagement and collaboration to meet business and governance requirements Integration of requirements in procurement processes and training
Academic and research institutions	To create knowledge exchange, promote research, influence new areas of study, and motivate students.	Direct dialogue, collaboration initiatives and research programs.	Climate change, innovative technologies, research and development, and collaboration.	<ul style="list-style-type: none"> Collaboration and partnerships with leading research environments worldwide Collaboration to promote competence development in Kongsberg together with USN Access to funding from the Research Council Yearly case competition at universities (USN and NTNU): Your extreme
Civil society	To inform, enhance and challenge our sustainability priorities. We exchange views and knowledge on relevant climate and environmental policies to align with the goals of the Paris Climate Agreement and promote sustainable ocean management.	Regular dialogue in meetings, locally and internationally. We engage in several arenas, including labour unions, industry associations, NGOs, and the UN system.	Sustainability related themes where we have a significant opportunity for positive impact such as climate change and threats to the environment and ecosystems. Topics across the ESG agenda such as responsible business conduct, employee relations and human rights.	<ul style="list-style-type: none"> Increased engagement in UN's Ocean Stewardship Coalition Improved sustainability reporting Added focus on human rights Improved communication of values and ambitions

As part of the double materiality assessment, affected communities and workers in the value chain were identified as stakeholder groups. Currently, we do not have a process to engage directly with these groups. Our channel of raising concerns is open for everyone, including affected communities.



Continuous Focus

Continuous Focus

In 2025 we have put significant effort in human rights training for staff that have the responsibility and possibility to discover potential human rights problems in our own operations, at third parties' or at suppliers'. The trainings have been well received and we face great interest both internally but also externally when discussing these topics. All business areas are in strong growth with a steady increase of staff, and the human rights trainings will therefore also continue into 2026 to secure a good and comprehensive understanding of the topic.

Our work with due diligence assessments is constantly improving as access to information with the help of new technology advances. In 2026 several of the business areas will start the implementation of a new due diligence tool, Sayari, which has proven to have much valued data on human rights, and given us a new dimension on information.

The environment in which we conduct our business is constantly evolving. As a result, our due diligence assessments will be a continuous process, enabling us to proactively identify new and emerging issues as they arise. This ongoing approach ensures that we remain vigilant and responsive to changes, allowing us to address potential challenges promptly and effectively. By regularly updating our assessments, we can better anticipate risks and adapt our strategies to maintain compliance and uphold our commitment to responsible business practices.

Looking ahead, we anticipate an increase in both internal and external audits that will specifically address human rights considerations. Given our company's size and geographic footprint, we have observed relatively few instances of potential or actual adverse human rights impacts to date. However, we acknowledge the importance of continuously improving our approach to human rights evaluation. As a result, we are actively exploring innovative and effective methods to assess human rights risks within our operations.

Our goal is to enhance our risk-based framework, ensuring that our processes remain robust and responsive to emerging human rights issues. By adopting new evaluation techniques, we aim to strengthen our ability to identify, monitor, and mitigate any potential human rights concerns, thereby supporting our commitment to responsible business practices and ongoing compliance with relevant standards and regulations.

You can request further information under the Transparency Act by contacting us at human.rights.requests@kog.kongsberg.com

If you identify a concern regarding KONGSBERG's business, you can raise it through our Raising Concerns platform.

