

Zenitel Transparency Act Report 2023

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1. ABOUT THIS REPORT

Zenitel provides integrated security communications for environments where life, property and assets are at stake. We keep people safe by enabling everyone to hear, be heard and understood - every time and everywhere. When 'standard communication' systems fail, especially during emergencies or at critical moments, Zenitel's solutions and systems stand above all others. It is in those moments, when life is at stake, that reliable communication systems are vital. This is our most significant contribution to the world - to ensure a safe and secure social environment by enabling our customers to protect life, property, and assets.

We conduct our business consistently with the United Nations (UN) Guiding Principles on Business and Human Rights and has incorporated the ten principles of the UN Global Compact. We also respect applicable standards of international humanitarian law.

This report is produced and published to give our stakeholders and the public an insight in how we work to protect universal human rights and ensure decent working conditions.

2. ABOUT THE TRANSPARENCY ACT

The Norwegian Transparency Act entered into force on 1 July 2022 and require all major businesses in Norway to protect universal human rights and ensure decent working conditions by conducting due diligence in all parts of its business and value chain, and publicly reporting the outcomes and actions.

The general purpose of the Transparency Act is to "promote businesses' respect for basic human rights and decent working conditions in connection with the production of goods and the provision of services, and ensure the public has access to information on how businesses deal with negative consequences for basic human rights and decent working conditions." (as translated from <https://lovdata.no/dokument/LTI/lov/2021-06-18-99> by google translate)

Zenitel, including its subsidiaries, is a large enterprise under § 3 of the Transparency Act, and as of 1 July, 2022 obliged to;

§ 4 - carry out due diligence assessments in line with the OECD's guidelines for multinational companies,

§ 5 – publish summary of the due diligence assessment of § 4, and

§ 6 – upon receipt of any written request give information about how the business handles actual and potential negative consequences identified in accordance with § 4.

This report set out the actions in accordance with the Transparency Act §§ 4 and 5, and how we intend to comply with § 6. The report covers the full year 2023. Equivalent legislation is concurrently being implemented in other countries in Europe. Both the UN and the OECD have published their own policies that multinational companies are recommended to follow. The OECD due diligence model has been transposed into Norwegian legislation in the new Transparency Act

3. ABOUT ZENITEL

Zenitel provides intelligent solutions where life, property and assets are at stake. From our position as a technology leader and the expert in audio, we continuously work to be the most professional, competent innovative and trustworthy for security and safety applications, always going the extra mile to develop ourselves and our partners to meet and exceed the end customers' needs.

Our solutions provide high availability, scalability, reliability, maintainability, and cyberdefensibility. By reducing hardware to a minimum, and keeping the benefits of centralized server management, organizations have more flexibility in scale and performance.

We keep people safe, by enabling everyone to hear, be heard and understood - every time and everywhere.

The organization consist of a Corporate headquarters in Belgium and three different business units addressing different market segments with different solutions through different go to market models. The three business units are:

- Transportation Solutions, which is operated out of Lewes, UK
- Safety and Security which is operated out of Oslo, Norway
- Maritime and Energy Solutions, which is operated out of Horten, Norway

There are 16 local Zenitel offices around the world with representation in more than 115 countries on all continents.

Around 80% of the products we sell is manufactured by five contract manufacturers in Europe and Asia. and then shipped to Norway and UK for testing and final assembly, before shipped to customers.

4. TRANSPARENCY ACT IN ZENITEL

When the Transparency Act entered into force, a supplier mapping was carried out. The result was a prioritization to do a risk assessment of the contract manufacturers and the creation of a Supplier Code of Conduct. This Code of Conduct as well as a letter with information about the Transparency act was sent out and have been signed by contract manufacturers.

The contract manufacturers have also filled out a supplier questionnaire with questions regarding financial stability, certifications, international experience, health & safety, production, environmental impact, ethics, labor, and safety.

A process for selecting and controlling suppliers specifies definition, selection, and audits of suppliers. During 2023, zero breaches/issues were found.

Zenitel is committed to the UN Global Compact and has a Human Rights policy that is available on the web site.

All employees undergo mandatory training via our Zenitel Academy on Code of Conduct and policies and are expected to use the procedure "Raising an integrity concern" to report suspected breaches.

To meet the Transparency Act requirement of allowing the public to inquire about human rights and decent working conditions, a form is published on the web site. During 2023, zero inquiries were submitted.

5. MITIGATING MEASURES AND FOLLOW-UP

In the case of breaches, an internal nonconformity process that specifies who is responsible and how to proceed, shall be followed.

During 2023, no breaches were reported or found. No inquiries were submitted from zenitel.com.

6. CEO SIGNATURE