

Zaptec Transparency Act report

About us

We change our world with cutting-edge charging solutions

At Zaptec, we're on a journey to enable better personal mobility for the many. Born on the rugged west coast of Norway, where horizons stretch far, it's clear to us that travel and exploration are a natural part of what makes us human. We're passionate about finding and enabling better ways to travel.

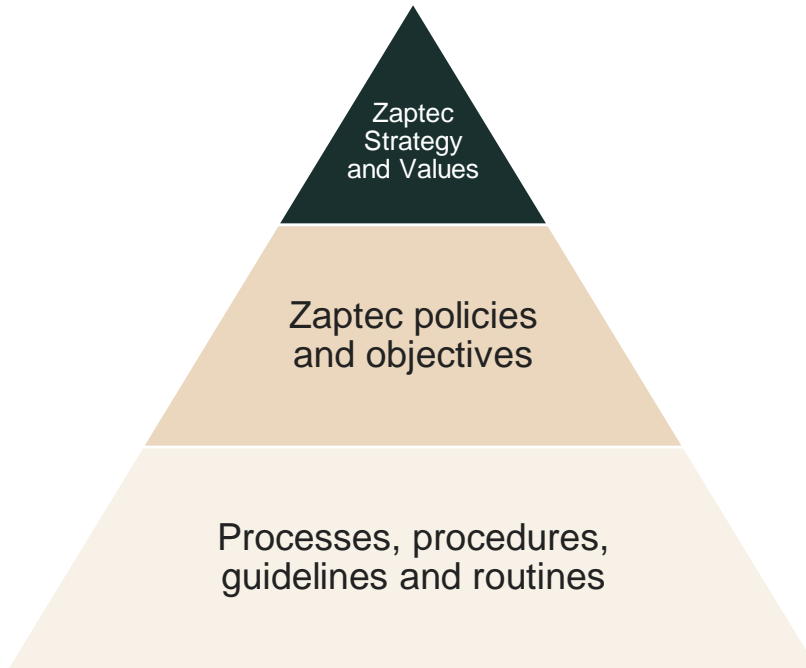
We combine the latest tech with human-centred design to offer highly intuitive and efficient EV chargers that ensure easier access to personal electric transport.

Within a few years, we've built our domestic market leading position by supplying superior charging installations for housing co-ops and private homes. And as a Norwegian EV pioneer, we aim to bring the best charging technology from the coast of Norway to the rest of the world.

Zaptec operates with Zaptec ASA as the parent company with a subsidiary in all active markets. The subsidiaries with activity and employees at the current moment are:



- Norway
- Sweden
- Denmark
- Germany
- Switzerland
- Netherlands
- Belgium
- Luxemburg
- France
- United Kingdom



Zaptec approach to the transparency act

All issues related to people, environment and human rights shall, as a principle, be at the core of Zaptec's operations. This is all documented in our management system and shall target to assess risk in all activities being performed.

- Zaptec has a personnel handbook with instructions, guidelines and policies related to human rights and the working environment. All employees have information about the working environment, overtime, benefits, insurance etc. Furthermore, are there policies to help guide all processes, procedures, routines, or guidelines implemented at Zaptec.

To ensure adequate whistle-blowing opportunities, we have distributed the contact information directly to our suppliers, included it in our supplier code of conduct, and added it to our website. Although no reports have been received thus far, we have implemented detailed written instructions to ensure that any future reports are treated with the utmost seriousness.

Zaptec has no written procedure for handling any adverse or potential adverse impacts. Should any adverse impacts be uncovered will, a group with representatives from HSEQ, Supply Chain, top management and any other stakeholders sit together and agree on any mitigating actions, remediation and or compensation if required.

Internal due diligence

Internal control mechanisms are established to ensure good working conditions and compliance with internationally recognized human rights. These internal control measures include:

Internal reviews

By mapping out all regulatory requirements, both those imposed to Zaptec by law in the countries in which we operate and those selected by Zaptec, we are able to review evidence in records and procedures to document compliance with the regulatory requirements. All

requirements are reviewed periodically to ensure continuous compliance and allow us to implement corrective actions when deemed necessary.

Revision

Zaptec has implemented an internal auditing program to periodically audit Zaptec's performance according to regulatory requirements. The audit program is designed to ensure all aspects of Zaptec's organization are audited during a 3-year cycle.

Safety rounds

The safety rounds are preventive HSE activities with the intent to prevent any negative effect on the working environment. The management's HSE and elected Safety Representative perform the safety rounds.

Working environment committee

The working environment committee consist of two elected representatives from the employees and two representatives from top management. The committee leader is elected among its members and will alternate between an employee representative and a management representative. The committee's purpose is to actively participate in the planning of HSE activities and to monitor the development of the working environment. The committee has the authority to mandate actions to be implemented, to demand closer investigations or commission an inquiry if deemed necessary.

External due diligence

Zaptec operates within the electronics industry, producing products with up to more than 800 individual components, thus making the supply chain a large and complicated matter. There is a total of 91 manufacturers being used and 55 suppliers. Only a few of these suppliers are direct supplies to Zaptec for mass production, but rather indirect suppliers through our EMC partners.

Zaptec has chosen to start focusing on suppliers as it is considered to have a greater effect as several of the suppliers are, in return dealing with several manufacturers, thus creating a ripple effect. Our effort has therefore been to categorize our suppliers based on the criticality of supply and implied risk of human rights or workers' rights violations. All suppliers have been categorized into four categories. This year's focus has primarily been on the two most critical supplier categories. However, going forward, our focus will expand to include manufacturers and less critical suppliers.

Zaptec findings

Internal findings

The policies established address relevant issues but are not well structured, which makes it difficult for Zaptec employees to familiarize themselves with these policies. Policies are also not well communicated within the organization. During internal reviews, there have been some findings, but the overall status is that there is no breach of human rights, and the working environment is healthy but with some areas of improvement in the approach to systematically working to improve HSE at Zaptec.

Zaptec's approach to systematic HSE has not been up to par, but improvements have already been implemented.

1. A working environment committee was established in early 2023
2. Safety representative was elected in early 2023
3. The overall responsibility for HSE was delegated to one responsible.

Country managers for each subsidiary have all reported on the status within their countries, and there are no findings of breach or risk related to human rights or the working environment.

External findings

Zaptec issued a supplier survey to the selected suppliers in early 2023 to acquire the necessary information. The feedback from our suppliers suggests that a greater level of understanding regarding the scope is necessary. Only 7.69% of our suppliers have been able to identify any risks associated with their own operations, and only 3.85% have identified risks related to their supply chain. Considering that Zaptec operates within the electronics industry and sources components from countries with known human rights risks and containing 3TG minerals, it is important to address these findings. As the responses indicate a lower risk level than anticipated, Zaptec will conduct further investigations to ensure that any potential risks are identified.

A majority of suppliers have signed our Supplier Code of Conduct as a commitment to comply with the requirements and expectations Zaptec has of its suppliers. Some of our suppliers were unwilling to sign the document based on internal rules but have, in all cases, either confirmed that they comply with the Supplier Code of Conduct or forwarded their internal code of conduct for us to review. All received codes of conduct will be reviewed thoroughly to ensure compliance with our Supplier code of conduct. If any gaps are identified between a supplier's code of conduct and the one imposed by Zaptec, appropriate mitigating actions will be implemented.

Some direct actions towards individual suppliers have been identified, and two actions towards the supply chain in general:

1. Perform campaigns towards suppliers to build awareness and understanding of Human Rights impacts.
2. Investigate why our electronic suppliers are reporting no risk within their supply chain.

Summary

The processes surrounding the human rights and working conditions due diligence process are relatively new, and the results reflect this. The process of due diligence related to human rights and working conditions also seems to be new within our supply chain, which is heavily reflected in the responses we receive from our suppliers. Moving forward, it is, therefore, critical that suppliers understand what is expected from them. Implementing campaigns towards our suppliers will also be helped by more laws based on the United Nations Guiding Principles on Business and Human Rights being implemented across Europe and the rest of the world.

Our findings give us some clear areas where we need to focus our efforts moving forward.

Supply chain

Within our supply chain, there is a clear need to build awareness and understanding of our expectations. There is also a need to investigate why no electronics suppliers are reporting any risks related to human rights.

Internal

There is a clear need to work systematically towards improving the working environment. There are no indications of human rights violations or indecent working conditions, but there is a need to work systematically to improve the working environment as a preventive measure.