ÅPENHETSLOVEN

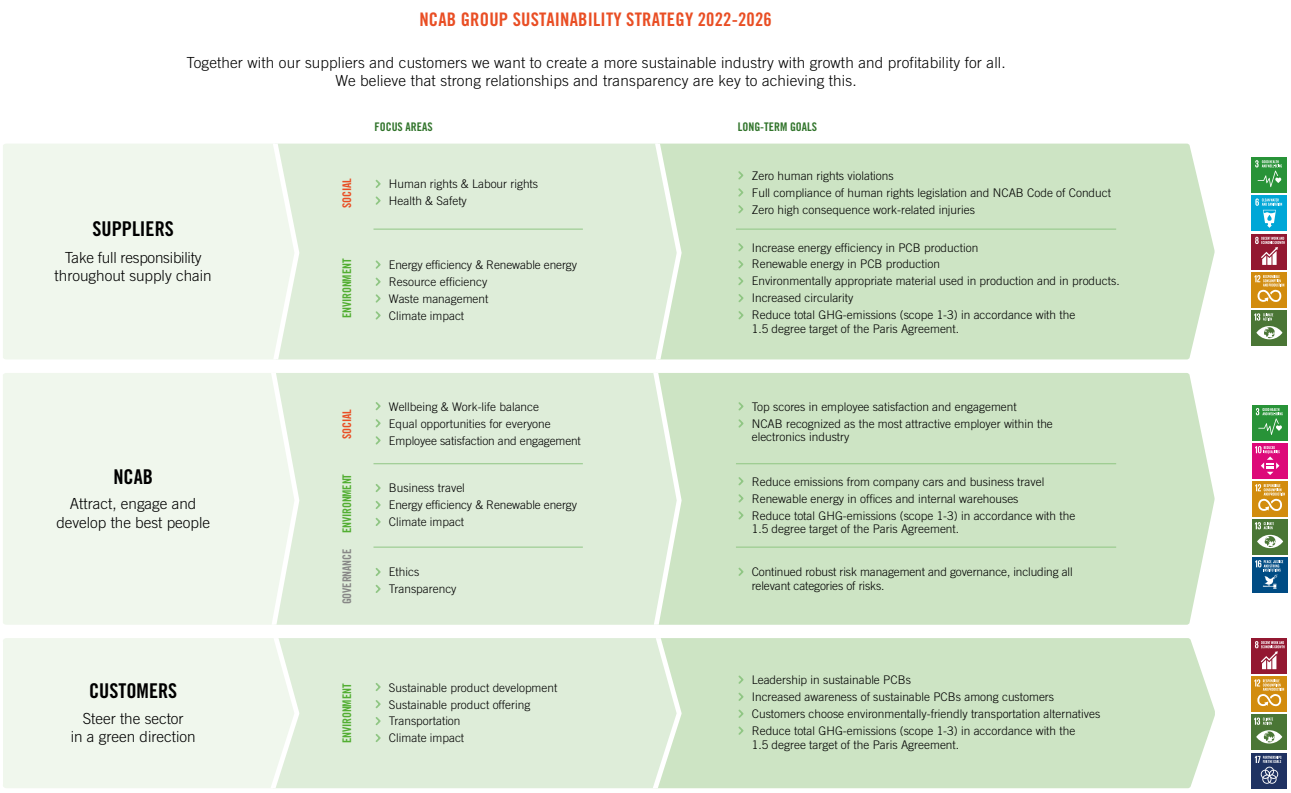
NCAB Group Norway AS er en del av NCAB Group som er et verdensledende selskap innen mønsterkortbransjen. Vi er i dag lokalisert i 19 land, 45 markeder med 660 spesialister. Vår produksjon er fordelt utover 35 fabrikker lokalisert i Asia, Europa og USA.

Hvert marked er et selvstendig og uavhengig salgsapparat, med hovedsete i Stockholm, Sverige.

Vårt mål er å være bransjeledende innen bærekraft og vi stiller strenge krav til våre underleverandører. Med det vil vi identifisere hva slags påvirkning NCAB Group har på miljøet, eiers forventninger og hvilke forbedringer vi kan gjøre. Vi deler vårt bærekraftarbeid i 3 underkategorier: Kunder, ansatte og underleverandører. Dets mål er å illustrere hvordan vårt arbeid med bærekraft styrker vårt forhold.

Vi startet vårt fokus på bærekraft allerede i 2014 og har siden jevnlig oppdatert vår strategi. Seneste oppdatering kom i februar 2022. Vår strategi spesifiserer vårt langsiktige mål og fokusområde, og ut i fra dette setter vi inn konkrete grep. På toppnivå er det styret og styreformann som er ansvarlig for at bærekraft er på agendaen. Siden dette er en integrert del av bedriften, så er dette et jevnlig tema i styremøter.

Gjennom vårt arbeid følger vi i dag 8 av 17 mål av FNs bærekraftmål.



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NCAB Group eier ingen fabrikker, men gjennom vårt Factory Management team leter vi etter langvarige samarbeidspartnere som vi kan jobbe tett med. Vi ønsker å være med å utvikle våre fabrikker og etterstreber å ligge i forkant når det gjelder arbeidsforhold, helse og sikkerhet, miljøpåvirkning og arbeidsrett.

Alle fabrikker vi samarbeider med må ha implementerte retningslinjer og systemer som skal hindre unnværelse av disse reglene som er satt av NCAB Group og disse må signere for våre etiske retningslinjer (code of conduct).

KEY IMPACTS, RISKS AND OPPORTUNITIES

The illustration below provides an overview of the material sustainability matters identified for NCAB, based on the results of the double materiality assessment.

Overview of key sustainability impacts, risks an opportunities identified for NCAB.
● Negative impact or financial risk ● Positive impact or financial opportunity

E1 CLIMATE CHANGE

Material impacts, risks and opportunities	Actual or potential impacts, risks or opportunities	Value chain	Description of material impacts, risks and opportunities
● **GHG emissions and carbon footprint**	Actual impact	↑ Upstream Own operations	NCAB's operations create **GHG emissions** in the various stages of the value chain that cause negative impacts on climate change. The largest emissions arise upstream in the value chain through the materials and energy used when manufacturing the PCBs. Another significant share of emissions arises during transportation of the PCBs from the factory to the warehouse or to the end customer. Within NCAB's own operations, emissions mainly arise from business travel and energy use in own premises and warehouses.
● **Use of energy** in PCB manufacturing	Actual impact	↑ Upstream	PCB manufacturing is **energy-intensive**, causing a negative impact if energy efficiency is low or if production relies on carbon-intensive energy sources. The overall impact is therefore strongly influenced by both how efficiently energy is used by the PCB manufacturers and the type of energy that powers the process.
● **Sustainable product** development and offering	Opportunity	↑ Upstream Own operations	**Sustainable product development** is a key business opportunity that drives innovations and strengthens our market position. By integrating sustainability already at the PCB design stage, we ensure quality and reliability while reducing environmental impact through lower material use, less waste, and reduced energy and water consumption.

E2 POLLUTION

Material impacts, risks and opportunities	Actual or potential impacts, risks or opportunities	Value chain	Description of material impacts, risks and opportunities
● **Pollutive emissions** to water and air	Potential impact	↑ Upstream	Potential negative environmental impacts may arise from **emissions to air and water** from contracted manufacturing facilities, primarily located in China. These emissions may exceed locally defined safe levels, posing risks to surrounding ecosystems and communities.
● **Use of substances of concern**	Actual impact	↑ Upstream	The use of **substances of concern in PCB production, including PFAS**, is an actual negative environmental impact that may contribute to pollution during manufacturing, use, and end-of-life stages. Their presence in products and processes is subject to increasing scrutiny, and future legal restrictions may affect both supply chain continuity and product design.

E3 WATER AND MARINE RESOURCES

Material impacts, risks and opportunities	Actual or potential impacts, risks or opportunities	Value chain	Description of material impacts, risks and opportunities
● **Water-intensive manufacturing**	Actual impact	↑ Upstream	PCB manufacturing is **water-intensive**. High water consumption in production processes can contribute to local water stress in regions where water availability is limited or unevenly distributed. This impact is primarily linked to our suppliers' operations, and the associated risks include potential regulatory changes.

E4 BIODIVERSITY AND ECOSYSTEMS

Material impacts, risks and opportunities	Actual or potential impacts, risks or opportunities	Value chain	Description of material impacts, risks and opportunities
● **Exploitation of ecosystems** when extracting raw materials	Actual impact	↑ Upstream	**Biodiversity and ecosystems** are considered material sustainability topics for NCAB due to actual negative impacts linked to land use and direct exploitation of nature in the upstream value chain. The extraction of raw materials used in PCB production can contribute to habitat loss, deforestation, and degradation of ecosystems, particularly in regions with limited environmental regulation. Although NCAB does not directly control these activities, their environmental consequences are relevant to our business and stakeholders.

E5 RESOURCE USE AND CIRCULAR ECONOMY

Material impacts, risks and opportunities	Actual or potential impacts, risks or opportunities	Value chain	Description of material impacts, risks and opportunities
● **Use of virgin, limited raw materials** in PCBs	Actual impact	↑ Upstream	The **extraction of raw metals and minerals,** such as gold, copper, tin, aluminium and cobalt, used in the PCB production, are often associated with environmental degradation, human rights concerns, and other supply chain risks. Nevertheless, certain raw materials remain necessary in PCB production, making responsible sourcing, efficient use, and the exploration of circular solutions essential.
● **Waste generation and waste management** in the production of PCBs	Actual impact	↑ Upstream	PCB manufacturing gives rise to both **hazardous and non-hazardous waste**. Hazardous waste may also occur during internal testing and scrapping. Non-hazardous waste includes mixed materials such as plastic, cardboard, and office waste.
● **Sustainable product** development and offering	Opportunity	↑ Upstream Own operations	**Growing customer demand for more recyclable and resource-efficient PCBs** represents a clear business opportunity. By developing solutions that minimise resource use and enable greater recyclability, we can strengthen our competitive position while supporting our customers' sustainability goals.

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S1 OWN WORKFORCE

Material impacts, risks and opportunities	Actual or potential impacts, risks or opportunities	Value chain	Description of material impacts, risks and opportunities
Workplace health and safety	Potential impact	Own operations	NCAB strives to provide a positive, safe, and secure physical and psychosocial work environment. Potential negative impacts from a workplace **health and safety** perspective include risks of incidents and accidents in **warehouse environments**, as well as risks associated with handling chemicals in laboratories.
Attractive employer	Opportunity	Own operations	To be an industry-leading company, it is essential for NCAB to **attract and retain talented and dedicated employees**. NCAB's focus on an inclusive culture, competence and career development, as well as health and well-being, represents a strategic business opportunity that drives a strong corporate culture, innovation, growth, and long-term success.
Technical skills and professional development	Risk	Own operations	In a knowledge-based industry where technology and customer needs evolve rapidly, it is essential to ensure keeping up with technical skills and competence development for employees. Failing to do so poses a critical business risk and limits the ability to attract new employees with competitive competencies.

S2 WORKERS IN THE VALUE CHAIN

Material impacts, risks and opportunities	Actual or potential impacts, risks or opportunities	Value chain	Description of material impacts, risks and opportunities
Working conditions in PCB factories	Potential impact	Upstream	Potential negative impacts related to **labour rights and working conditions** are especially found in our main factories in China. These potential negative impacts include unfair wages and limited freedom of association. Further more, risks related to occupational health and safety are also present at these manufacturing sites.
Human rights and labour rights	Potential impact	Upstream	There are potential **negative human rights and labour rights** impacts related to the extraction and processing of raw materials further up the supply chain. The potential presence of conflict minerals poses risks of violations of workers' rights and human rights, given that associated mining operations are often connected to armed conflict, forced labour, child labour, and severe environmental damage.

G1 BUSINESS CONDUCT

Material impacts, risks and opportunities	Actual or potential impacts, risks or opportunities	Value chain	Description of material impacts, risks and opportunities
Corporate culture	Opportunity/Risk	Own operations	**A strong and value-driven corporate culture** is considered a financial opportunity for NCAB. Fostering a culture of responsibility, transparency and innovation, strengthens our company brand and reputation as well as supports long-term business development. Consequently, failing to actively uphold a strong corporate culture represents a business risk as it weakens the company's brand and reputation.
Business ethics, bribery and corruption	Risk	Own operations	NCAB operates in a **global environment where a varying degree of corruption exist.** Corruption deepens global poverty, undermines democracy and the protection of human rights, damages trade, and reduces trust in social institutions and the market. It may also entail a risk of damage to the brand and company reputation. It is therefore important to combat all forms of corruption. No specific function or part of the organization has been identified as particularly exposed to risks related to corruption and bribery.
Supplier relations	Opportunity	Own operations	NCAB's business model relies on **strong and long-term relationships with selected PCB manufacturers** and other reliable business critical suppliers. Successful management of supplier relationships enables NCAB to be the preferred business partner and represents a business opportunity by strengthening supply chain reliability, quality, and competitiveness.

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NCAB Group gjennomfører årlig gjennomgang og revideringer av alle våre underleverandører for å sikre at våre krav blir fulgt.

Ett av kravene er at våre fabrikker skal rapportere bruken av farlig avfall og bruk av CMRT (Conflict Minerals). I tillegg skal alle fabrikker besvare våre krav om hvorvidt de har satt egne mål om klimautslipp og miljøpåvirkning. Dersom NCAB Group finner det nødvendig vil vi følge opp de fabrikker vi anser som har forbedringspotensialet.

BEST I KLASSEN FABRIKKER

Vi ser kun etter langvarige samarbeidspartnere. Som en del av NCAB Groups utvelgelsesprosess blir potensielle fabrikker vurdert ut ifra et kvalitets- og miljøperspektiv og siden 2015 er også bærekraft blitt en del av kriteriene. Våre gjennomganger skjer hos fabrikkene.

I tillegg skal våre fabrikker møte følgende krav.

- Sign and comply with our Code of Conduct for Suppliers, which is aligned with the Responsible Business Alliance (RBA) requirements.
- Pass our quality and sustainability audits
- Be ISO 9001 certified (quality management system)
- Be ISO 14001 certified (environmental management system)
- Report on conflict minerals and cobalt according to the frameworks provided by the Responsible Minerals Initiative (RMI) and follow the Responsible Minerals Assurance Process (RMAP)
- Comply with legislation covering raw material content (RoHS, REACH, TSCA, California Proposition 65, POPs (Persistent Organic Pollutants)
- Comply with local regulations covering social compliance and environmental impact 2021.

Her er en oppsummert gjennomgang om hvordan NCAB Group arbeider med våre revideringer av fabrikker:

HERE IS OUR AUDIT PROCESS, IN BRIEF:

Normally it takes two-three days to conduct the full sustainability audit, and one day to do the follow-up audit. Every audit is done on factory site and follows a detailed template consisting of six parts:

- Management System
- Human Rights
- Labour and Working Conditions
- Health and Safety
- Environment
- Business Ethics

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CMRT

NCAB Group har forpliktet seg til å kun anvende konflikt frie mineraler. 3TG Mineralene (Tin, Tantalum, Tungsten og Gull) og kobolt skal ikke være linket opp til utvinnere som bryter med menneskerettighetene og befinner seg i konfliktområder. Vi krever at våre fabrikker eksklusivt samarbeider med mineralutvinnere som forholder seg til gjeldene RMI (Responsible Minerals Initiative) regler og følger RMAP (Responsible Minerals Assurance Process).

Vi lærer opp våre fabrikker om hvordan de kan bruke RMI skjemaet for å kontrollere sin verdikjede.

For å påse at dette blir etterlevd har NCAB Group Factory Management Team en gjennomgang på rutiner og dokumentasjoner hos fabrikkene minst én gang i året.

Conflict minerals



NCAB gjennomgår fabrikkenes rapporter og undersøker om de anvender smeltebruk som er listet opp i «Conformant Smelter List» som er en del av RMI listen.

Dersom en fabrikk anvender et smelteverk som ikke er en del av RMI, så vil NCAB Group agere og undersøke om smelteverket har planer om å bli et godkjent smelteverk. Dersom de ikke har planer om å bli godkjent, vil NCAB Group iverksette planer om å ekskludere smelteverket fra leverandørlisten.

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Vi forplikter oss til å ta fullt ansvar gjennom vår verdikjede.

Measurable goals

- 100% sustainability-audited and approved main factories
- Continuously improve sustainability performance throughout the supply chain
- Increased energy efficiency and use of renewable energy in PCB production
- Environmentally appropriate materials used in production and in products
- Scope 3 emissions – related to PCB manufacturing and transportation of PCB

Actions and achievements 2025:

- ✓ Continuing our sustainability audit programme in factories, improving factories' conditions of health and safety, and working conditions, and environmental performance.
- ✓ In 2025, we performed 14 sustainability audits, as well as 6 follow-up audits, where result show positive development and mitigated risks.
- ✓ Our target that all main factories in China should undergo a sustainability audit every second year was achieved.
- ✓ High quality performance – 99.4% – continued developing our quality processes and performance to keep high quality and reliability level, and to minimize scrap and resources used.
- ✓ Scope 3 emissions from supply chain – continued dialogue and activities together with the main factories to jointly strive to reduce emissions in the value chain. Focus set on improved energy efficiency and increase of renewable energy, and waste reduction.
- ✓ More factories install solar panels (now 15 in total, compared to 9 in 2024), steps in the right direction, but still cover a very small part of the energy consumption.
- ✓ Increased portion of fossil free energy (renewable + nuclear) in manufacturing our PCBs, 41% (38% in 2023).
- ✓ Introduced new packaging for delivery of our PCBs. We optimized our packaging from a material, circularity, and weight perspective for less environmental impact.

Status December 2025 ● = far from achieved ● = on track ● = completed/achieved

OUR STRENGTHS

- Clear demands, strong relationships, close dialogue and cooperation, detailed sustainability audits.

GREATEST RISKS

- Resource use, chemicals and waste management, emissions to water and air, and contamination of soil.

GOING FORWARD

- Continue our sustainability audit programme, focus on energy efficiency and renewable energy, water consumption and waste management, and health and safety working conditions.
- Continue our quality audit programme, focus on efficient production processes and high quality products, for efficient resource use and reduction of waste.

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MISLIGHET

Dersom mislighet skulle oppstå har alle ansatte i NCAB Group egne varslingssider de er pliktig til å anvende.

Her skal ansatte fylle ut i detalj, hva de har observert, hvor misligholdet fant sted, når det skjedde og hvem var involvert. NCAB Group oppfordrer ansatte, kunder, leverandører og andre partnere til å rapportere mislighet.

BEDRIFTSKULTUR

NCAB Group er en global organisasjon som vokser både organisk og gjennom oppkjøp.

For å implementere vår sterke bedriftskultur har vi onbording program, faglige treninger, arrangementer der alle markedene møtes til felles samling for utvikling og lederkurs.

Vi opererer i en industri der utviklingen skjer utrolig raskt og det gjelder å holde tritt med utviklingen. For å få til dette har NCAB Group utviklet NCAB Academy, en digital lærings- og utviklings plattform hvor alle ansatte har tilgang til digitale kurs som de kan fullføre i sitt eget tempo ut i fra hvor erfarne de er. I tillegg til web baserte kurs tilbyr vi også trening gjennom online kurs og workshops.

En fullstendig sustainability rapport som viser hvordan vi arbeider internt og i vår leverandørkjede, kan lastes ned fra våre hjemmesider.