

# **Transparency Act Statement 2023**

**Jotron AS**

## 1. Background

The purpose of the Norwegian Transparency Act is to promote enterprises' respect for fundamental human rights and decent working conditions. Additionally, it ensures public access to information on how enterprises address issues related to human and labour rights.

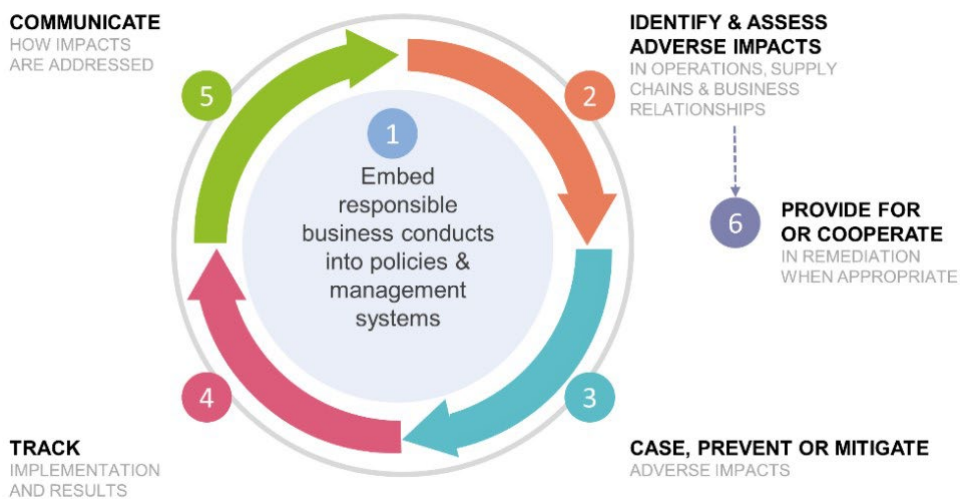


Figure 1: Due diligence in accordance with the OECD Guidelines

## 2. About Jotron

Jotron is a Norwegian limited company with more than 55 years of continuous operations in international markets. Jotron markets, develops, produces and services professional communication systems for security on land, sea and air. The headquarter is in Larvik, Norway.

Jotron's product portfolio consists of two main groups:

- Maritime products related to Global Maritime Distress Safety System (GMDSS) and maritime navigation products
- Radio and recorder products for Air Traffic Control (ATC) and coastal communication

The maritime products are sold through authorised distributors in more than 60 countries across the world, in addition to our own subsidiaries. Jotron has trained personnel from more than 200 companies to provide worldwide service on Jotron products.

ATC and coastal products and systems are sold through larger tender processes, often towards public authorities.

Jotron consists of:

- Jotron AS
- Jotron SKIPPER AS (from 01.06.2023)
- UAB Jotron
- Jotron UK Ltd
- Jotron USA Inc
- Jotron Asia Pte Ltd

### **Jotron AS**

Jotron AS was founded in 1967 and has direct responsibility for research and development (R&D), logistics management, production, sales and service on both product groups. Jotron AS is certified in accordance with ISO 9001:2015, ISO 14001:2015, ISO 27001:2017 and ISO 45001:2018.

### **Jotron SKIPPER AS**

Jotron SKIPPER AS (former SKIPPER Electronics AS) was founded in 1984 and merged with Jotron AS in 2023. Jotron SKIPPER AS develops and sells maritime navigation equipment and is certified in accordance with ISO 9001:2015.

### **UAB Jotron**

UAB Jotron was founded in 2001 in Kaunas, Lithuania. The company is an integral part of the production in Jotron. UAB Jotron produces and tests professional electronics, cables and mechanical systems. UAB Jotron is certified in accordance with ISO 9001: 2015, and ISO 14001: 2015 and ISO 27001: 2017.

### **Sales offices**

Jotron UK Ltd was founded in 1980. The company serves the British market through a network of professional agents from the facility in Newcastle, England. Jotron UK is certified in accordance with ISO 9001: 2015, ISO 14001: 2015 and ISO 27001: 2017.

Jotron USA Inc was founded in 2003 in Houston, Texas. The company serves and develops the markets in America and Canada. Jotron USA is certified in accordance with ISO 9001: 2015, ISO 14001: 2015 and ISO 27001: 2017.

Jotron Asia Pte Ltd was established in 2004, having previously operated as a representative office since August 2002. Based in Singapore, the company is responsible for the Asian markets. Jotron ASIA is certified in accordance with ISO 9001:2015, ISO 14001:2015 and ISO 27001:2017.

## **2.1 Management**

Jotron AS is led by the managing director in compliance with the provisions of the Companies Act. In addition to the managing director, Jotron's top management consists of directors for the three divisions; operation, ATC&C and R&D, and directors for the support departments. Management meetings are held monthly, with mandatory attendance for all top management members. Each leader reports on their areas of responsibility to the managing director. The top management ensures that responsibilities, roles and inherent authorities are defined and communicated throughout the organisation.

### **3. Human and labour rights in own operations**

#### **3.1 Ethical guidelines for employees**

Jotron's capacity to create economic value relies on upholding high ethical standards as the foundation of trust-based and binding relationships with society, company owners, employees, business partners, customers and suppliers. Ethical business conduct goes beyond merely avoiding legal breaches; it encompasses how we interact with each other and with society. Every employee is accountable for adhering to rules and guidelines rooted in Jotron's company values, which cultivate qualities of which we can be proud.

All Jotron employees are required to familiarise themselves with Jotron's ethical guidelines. This document outlines our interactions with employees, customers, suppliers, competitors and publish authorities in accordance with the UN's Universal Declaration of Human Rights. Mandatory e-learning courses on ethical guidelines are provided for all employees.

#### **3.2 Working conditions, diversity and equality**

Jotron shall comply with UN's Universal Declaration on Human Rights, The UN's Convention on Rights of the Child and International Labour Organization Conventions (ILO conventions). No potential or actual adverse impacts on human and labour rights are identified in Jotron's own operations.

Jotron shall not engage in or support any kind of use of child labour. If a young worker is employed, this is controlled and arranged according to legal requirements in terms of safety, work hours and guidance and is not allowed to interfere with applicable compulsory schooling.

Jotron respects all individuals and is actively making efforts to ensure a good working environment characterised by equality and diversity. Equality with respect to gender, ethnicity, nationality, religion, age and other diversity factors, as well as openness and tolerance, shall characterise our working environment. Behaviour must be based on the respect for others, and other cultures, religions and customs must also be respected. Fair employment practises following local norms and laws is the basic standard in all Jotron entities. No form of discrimination, harassment or bullying is tolerated. The company has developed a salary system based on work experience and qualifications, irrespective of gender, age, or disabilities.

More information about Jotron's work for equality and non-discrimination is described in our annual statement of equality and non-discrimination.

#### **3.3 Whistleblowing, non-conformities and corrective actions**

Employees are encouraged to raise all concerns regarding potential non-compliance with ethical guidelines and other misconduct to their immediate supervisor. The whistleblowing procedure for employees is described in Jotron's employee handbook.

Non-conformities and corrective actions are reported in Jotron's management system.

## 4. Human and labour rights in the supply chain

Jotron sourced products and services to core business activities from 336 suppliers exceeding NOK 100.000 per supplier in 2023. These suppliers were spread across 3 continents and 24 countries. However, the majority of products and services, in term of purchase costs, were sourced from suppliers in Europe (88,21%), see figure 2. The Nordics make up 57,86% of the European purchases.

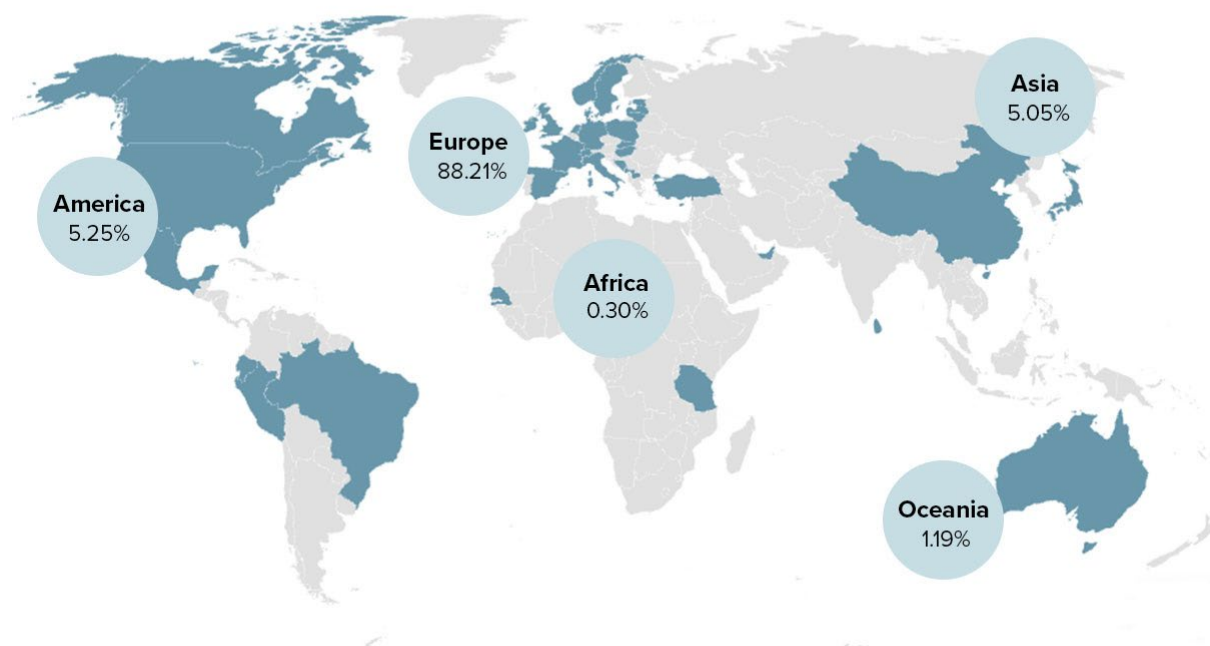


Figure 2: Geographical location of Vow suppliers and distribution of costs in 2023 according to continents

### 4.1 Ethical guidelines for suppliers

Jotron's Supplier Code of Conduct outlines our expectations for suppliers in the areas of human rights, fair labour conditions, health and safety, environment, conflict minerals, business ethics, anti-corruption, and more. Our suppliers are expected to support the UN's Universal Declaration of Human Rights and ensure that they are not complicit in human rights abuse. Moreover, we expect Jotron suppliers to replicate these standards further down their own supply chain.

## 4.2 Qualification of new suppliers

Jotron has developed a supplier qualification questionnaire that includes questions on human rights, working conditions, environment and anti-corruption. We will be working on implementing this questionnaire going forward.

## 4.3 Due diligence assessment of Jotron’s suppliers

### Step 1: Identifying potential adverse impacts

To identify potential adverse impacts in the supply chain, we conduct an overall risk assessment for suppliers with purchasing costs of at least NOK 100.000 in the relevant fiscal year. This risk assessment is based on the supplier’s home country and utilises internationally recognised indexes that measure risk levels related to human rights, labour rights and corruption, see table 1 for details. The indexes are updated on annual basis.

Topics	Index	Description
Human rights	WJP Rule of Law Index - Fundamental rights	This index provides an overview of the degree to which fundamental rights established under UN’s Universal Declaration of Human Rights are embedded in the law of different countries
Labour rights	Trade Union Confederation	Based on data from trade unions, this index documents violations of internationally recognised collective labour rights committed by governments and employers.
Corruption	Transparency International	Based on expert opinions and data from different institutions, this index provides an overview of the perceived level of corruption in the public sector.

Table 1: Indexes used in the process of identifying potential adverse impacts

The standard scale employed for risk assessments in Jotron ranges from 1 – very low risk to 5 – very high risk. Suppliers located in countries with medium risk or higher, on one or more of the indexes will be explored further. For suppliers located in countries with very low risk or low risk on all indexes the process ends here.

Through the initial screening of suppliers based on their countries, there were 42 suppliers headquartered and/or operating in countries with medium risk or higher on one or more of the indexes used in the assessment.

## Step 2: Identifying actual adverse impacts

To identify actual adverse impacts on human and labour rights, we distribute a due diligence questionnaire to suppliers located in countries identified with medium or higher risk in step 1.

The due diligence questionnaire consists of 34 questions divided into 5 topics. Although most of the questions are related to human and labour rights, we have also included questions addressing environment and anti-corruption.

Main topics	Question topics
General information	Company information, product information, sustainability strategy, sustainability reporting
Policies and procedures	ESG topics in guidelines (particularly related to human and labour rights), ESG requirements to suppliers, on-site audits, management systems
Human and labour rights	Employment agreements, wage and compensation, working hours, health and safety, whistleblowing, freedom of association and collective bargaining, equal opportunities for employees, human rights due diligence, child labour, forced labour, actual adverse impacts
Anti-corruption	Confirmed incidents, anti-corruption training, legal cases
Environment	Carbon footprint accounts, emissions reduction targets, compliance with environmental laws

Table 2: Topics included in the due diligence questionnaire

18 suppliers completed the questionnaire, resulting in a response rate of 43%. These suppliers are from Germany, China, USA, England, Italy and Poland, and represents manufacturers and companies offering hardware and services.

## **Results and measures**

The results of the due diligence questionnaire did not identify any actual adverse impacts on human and labour rights but have identified potential risks of such impacts. Jotron will address these findings by prioritising the highest risks.

To mitigate the risks for adverse impacts on human and labour rights, Jotron has moved some of our purchases from China to Europe and enhanced the due diligence procedures for both new and existing suppliers.

Jotron is also considering establishing a whistleblowing channel for external stakeholders to provide external stakeholders the opportunity to raise concerns about non-compliance with our ethical guidelines and other misconduct.

## **5. Contact information**

For questions about this report and our procedures for promoting fundamental human rights and decent working conditions, please send your request to [purchase@jotron.com](mailto:purchase@jotron.com).

Signed

Managing director

Signed

Board of directors