



Transparency Act Report 2025



About the report

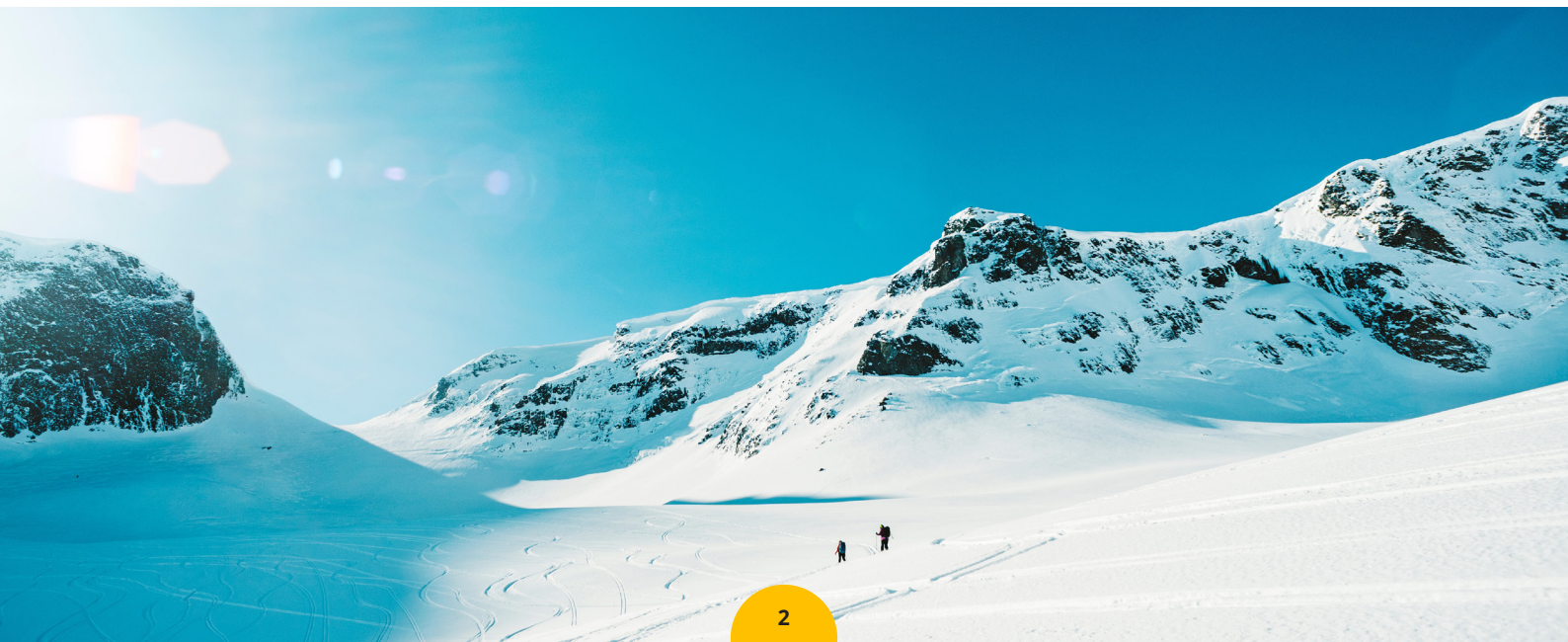
Continued commitment to human rights across our business

Airthings fully supports and respects internationally recognized human rights, decent working conditions, and labor standards, not only for our own employees but also throughout our supply chain. We adhere to or exceed national laws and regulations wherever we operate, and we maintain zero tolerance for harassment, discrimination, human trafficking, and child labor. We work to ensure these commitments are upheld in our supply chain and continually evolve our practices through feedback and learning. By fostering diversity, inclusion, and fair treatment, we create an environment where people are not only empowered to breathe better, but also to live better.

This report documents Airthings ASA's compliance with the Norwegian Transparency Act, due by June 30, 2025. It covers data from June 2024 to June 2025. It follows the UN Guiding Principles on Business and Human Rights, the OECD's Due Diligence for Responsible Business Conduct, and Airthings' policies on human rights, diversity, inclusion, and supplier conduct.

Our business practices are designed to reflect our dedication to the United Nations Sustainable Development Goals (SDGs), particularly focusing on SDGs 3 (Good Health and Well-being), 8 (Decent Work and Economic Growth), 11 (Sustainable Cities and Communities), 12 (Responsible Consumption and Production), 13 (Climate Action) 4 (Quality Education), and 10 (Reduced Inequalities).

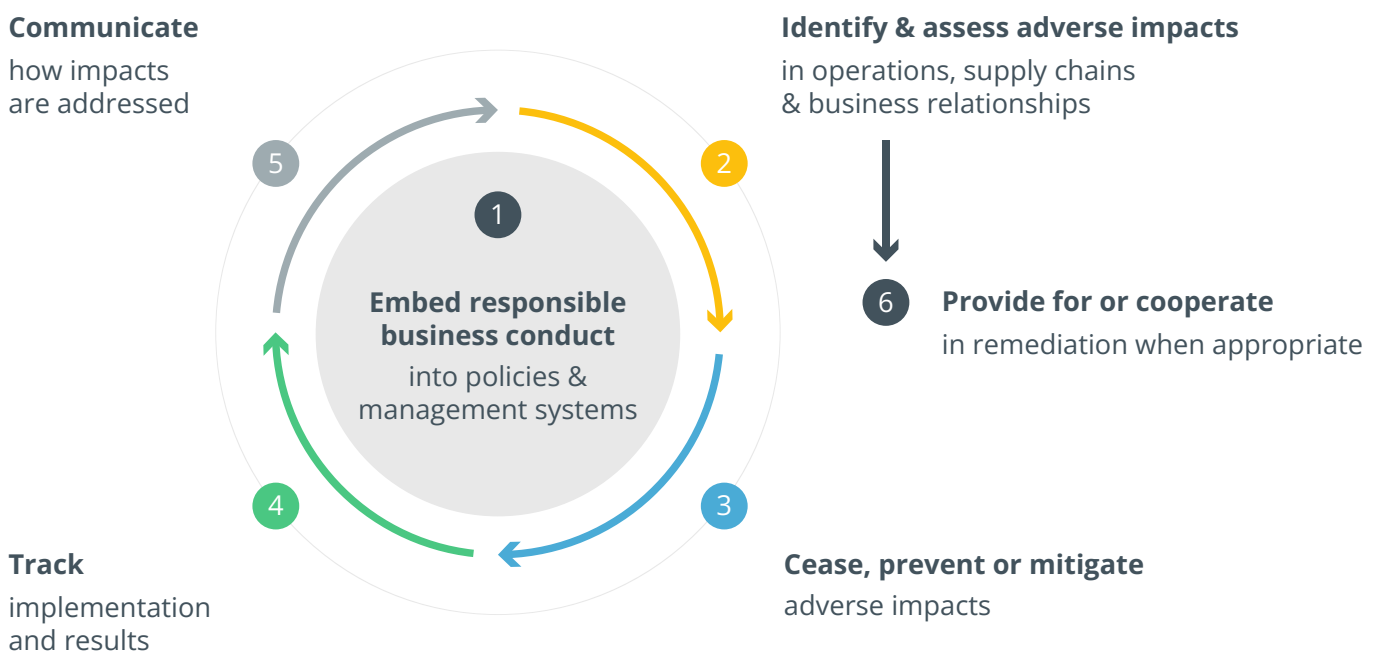
All previous reports are available at <https://www.airthings.com/investors/reports> and airthings.com/sustainability. Any inquiries can be sent to transparency@airthings.com.



About Airthings

Airthings is a global technology company and producer of award-winning radon and indoor air quality monitors for homeowners, businesses, and professionals. Founded in 2008, Airthings is on a mission to ensure that people around the world recognize the impact of indoor air quality and take control of their health through simple, affordable, and accurate technology solutions. We expect indoor air quality to be seen as a basic need in the future, as awareness and insight around the importance of air quality grows.

Airthings is an early mover and thought leader pursuing a massive market opportunity supported by positive megatrends. People are increasingly aware of their personal health, and they care for their health and awareness of IAQ wherever they go. As a part of people's lives, Airthings provide solutions ensuring people's safety, wellness and performance, whether they are at home, at school or at work.



Our suppliers and business partners

Evaluating regional ESG vulnerabilities and guiding material topic identification

Airthings maps our suppliers across 1st, 2nd, and 3rd tiers, and classifies them by risk levels. ESG risk assessments are conducted using available information for the electronics sector based on the Responsible Business Alliance framework. The primary risks in the tech sector arise beyond 2nd tier suppliers, particularly in raw material sourcing, where issues like environmental degradation, child labor, human rights violation, and hazardous chemicals are prevalent (1). This informed our analysis of potential risks and known impacts across our product value chain, as illustrated in the graph below, aiding the identification of material topics.

The company's 1st tier suppliers and business partners are distributed across Europe, the Americas, and Asia, with 65% based in Europe, 30% in North America, and 5% in Asia. Among identified 2nd tier suppliers, 45% are located in Asia, 30% in Europe, 20% in Africa, and 5% in North America.

Airthings outsources manufacturing to suppliers in Norway, Tunisia, Israel, China, and Malaysia, with key hardware components primarily sourced from China. We maintain close collaboration with our main manufacturers on ESG, including human rights, and are currently working with them to identify risks among second-tier suppliers involved in producing printed circuit boards, plastics, batteries, and other components.

Airthings does not focus on detailed assessment of human rights and decent working conditions or Norwegian manufacturers as they are all classified as low risk.

Tunisia faces significant human rights concerns, including political repression, weakened judicial independence, restrictions on freedom of expression and the press, and systemic abuses against migrants and minority groups. Recent mass trials and harsh sentences against opposition figures signal a continued shift toward authoritarianism. Discrimination against women, people with disabilities, and LGBTQ+ individuals remains widespread (2).

Doing business in Israel carries human rights risks, including the ongoing war in Israel/Gaza, settlements in occupied territories, and concerns regarding the treatment of Palestinian populations. Vigilant monitoring and engagement with suppliers are crucial to addressing these risks and upholding human rights standards in the supply chain (2).

In Malaysia, the government continues to suppress dissent and minority rights despite abolishing the mandatory death penalty. Repressive laws are used against critics, and refugees, migrants, LGBT people, and Indigenous communities face systemic discrimination. The overall human rights trajectory remains concerning, requiring ongoing monitoring and due diligence (2).

In China, severe restrictions on free expression, religion, civil society, and minority rights continue. Authorities have intensified control over Xinjiang, Tibet, and Hong Kong, and broadened surveillance and censorship nationwide. Recent legal changes and foreign policy assertiveness signal a continued shift toward authoritarian consolidation and global norm-challenging behavior (2). Airthings remains vigilant to our suppliers in China regarding this subject.

References:

1. [EY - Top 10 business risks and opportunities for mining and metals, 2025](#)
2. [Human Rights Watch World Report 2024](#)
3. [Responsible Business Alliance](#)



Policies, principles and guidelines

Our framework for ethics, supplier standards, risk management, and stakeholder trust

Since our last Transparency Report (June 2024), we have continued to strengthen our governance framework by updating internal policies and ensuring consistent compliance across the organization. This ongoing work supports our ambition to operate as a highly trusted and responsible company. To uphold the integrity of our operations, we provide training for all employees on key topics, including information security, human rights, anti-bribery, and anti-corruption every second year. A subset of employees also receive HSE and first aid training.

Business ethics and policies

Human Rights, Diversity and Inclusion policy and Equality Statement

To ensure alignment with our **Human Rights, Diversity, and Inclusion Policy**, all employees are required to read and acknowledge the policy and complete relevant training. Our approach reinforces a respectful and inclusive working environment. The company's **Equality Statement** is publicly available at airthings.com/investors/equality.

Anti-Bribery and Corruption policy and Procurement Guideline

As part of our commitment to ethical business conduct, we have implemented a comprehensive **Anti-Bribery and Corruption Policy** applicable to all employees, officers, directors, and agents. The policy prohibits bribery, corruption, and any unlawful activity.

To reinforce financial transparency, a mandatory cost approval process is in place for all purchases exceeding USD 5,000. Our **Procurement Guidelines** further ensure that purchasing decisions align with our principles of circularity, environmental responsibility, and ethical labor practices. This structured approach promotes objective, cost-effective, and socially responsible sourcing.

Suppliers Code of Conduct

To address environmental and social risks across our supply chain, we introduced a **Supplier Code of Conduct** in October 2021. This code is aligned with the standards of the Responsible Business Alliance and the Responsible Mining Association. In developing the policy, we facilitated participatory workshops with our key manufacturing partners, reflecting our commitment to inclusive stakeholder engagement.

Health, Safety and Environment management system

We maintain an **HSE management system** designed to prevent workplace accidents and environmental harm, and to promote overall well-being. Our operations are governed by a precautionary approach, ensuring that health, safety, and environmental concerns are planned for and prioritized. Our products and services must be safe for both customers and employees, with minimal impact on the external environment.

Information Security Policy and Management System

The Company's ability to process and safeguard information is central to delivering high-quality services and products. We are certified under **ISO 27001**, and our **Information Security Management System (ISMS)** is fully integrated into our broader risk management and corporate governance framework. This policy applies to all internal and external information processing for which the Company is responsible, including both operational data and product-related information.

Report and incident - whistleblower program

The Company operates a robust **Whistleblower Program** underpinned by a strict non-retaliation policy, offering confidentiality and anonymity to individuals who report concerns. An independent **Assessment Team** investigates potential breaches of our policies, including the Supplier Code of Conduct and human rights standards. In 2024, a request for a deeper human rights and decent working conditions assessment concerning a supplier was carried out.



Due diligence process and results

Mapping supplier criticality and risk to guide due diligence and compliance efforts

We classify suppliers and business partners as important through:

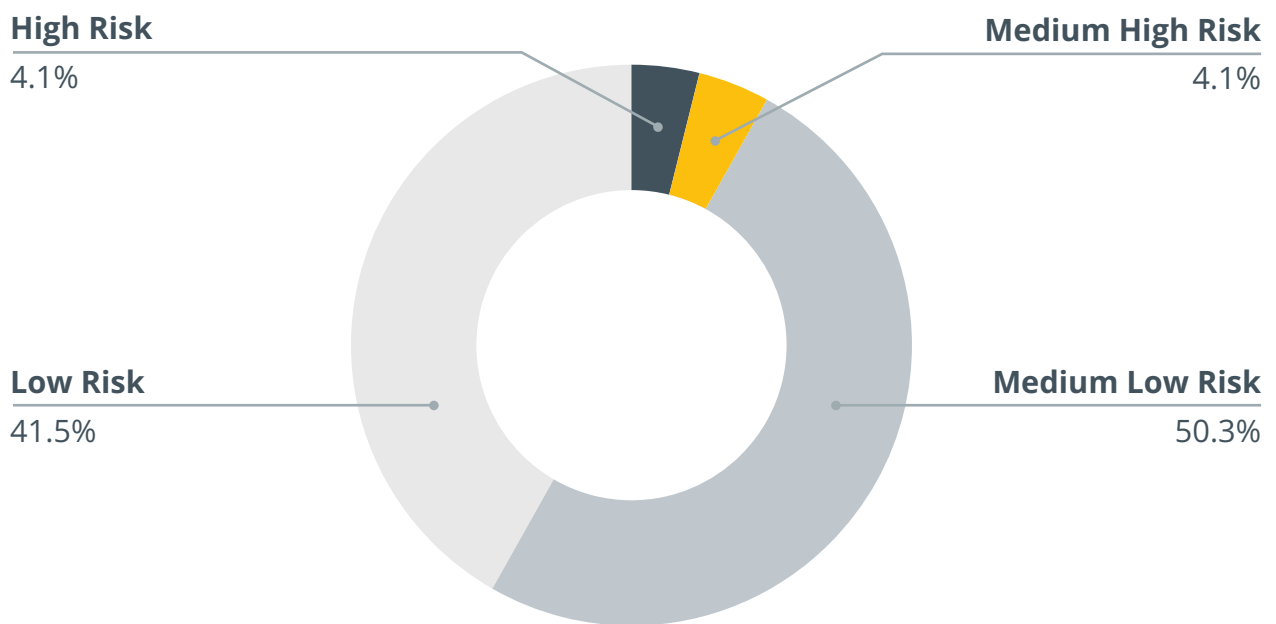
1. Evaluating their position in our supply chain
 - First tier suppliers and business partners: The economical procurement amount from the supplier/business partner purchased by Airthings: We classify the suppliers based on Procurement Value of over 200,000 NOK per year (1)
 - Second tiers sub-suppliers: We declare those with Critical Components for Hardware Products as important. These are suppliers that cannot easily be exchanged in the manufacturing process.
2. Assessing the level of risk in the suppliers'/business partner country of operations: We rely on the Civil Liberties Index, the Human Rights Watch Report, and the OHCHR Report to measure human rights country risks. Likewise, the environmental performance index per country impact level (EPI), and corruption country level by Global Risk Profile data set.
3. Public information and internal assessments on ESG Policies by the supplier/business partner. We then research public information found via online and other ESG sources to find policies, guidelines and strategies. If classified as a medium risk supplier, we continue the assessment by sending our Suppliers Code of Conduct for signing. If considered a high or extreme-risk supplier, we send the Suppliers Code of Conduct plus a Supplier's Code of Conduct questionnaire.

Based on the assessment, 92% of suppliers are low or medium-to-low risk and require no further assessment. The remaining 8% need additional scrutiny. Out of these, approximately half have answered our questionnaire or signed our Suppliers code of conduct. We are currently working on covering the remaining suppliers through these mechanisms.

Regular audits and site visits to our manufacturers in Tunisia and China confirmed adherence to our standards, with no evidence of human rights violations and excellent working conditions documented. These manufacturers have also undergone third-party SMETA (Sedex Members Ethical Trade Audit) assessments, demonstrating ongoing improvements in line with international ethical trade benchmarks.

For the reporting period, no significant non-compliance with our Supplier Code of Conduct has been identified. However, we recognize the limitations of relying solely on documentation and dialogue. To strengthen our due diligence, we will continue to prioritize on-site audits, including SMETA or equivalent third-party assessments, for more suppliers in order to gain deeper insight and ensure continued compliance throughout our supply chain.

Suppliers / Business partners - Risk Level



Footnote

1. The threshold for suppliers has been increased from 100,000 NOK per year in previous years, to align with the materiality threshold used for the annual audit.

Highlights in reporting period

Evaluating progress on supplier assessments, site visits, and human rights training initiatives

	Achievement 0-100	Description	Actions and Results
Update due diligence assessment	80%	Update and enhance the due diligence assessment process to better identify and mitigate risks across all supplier tiers, especially if medium and high risks are identified. Continue to map out additional 2nd and 3rd tiers from our important suppliers.	The due diligence assessment process was updated to ensure a consistent and adequate level of detail across suppliers. However, mapping of third-tier suppliers has not progressed due to resource constraints limiting outreach capacity.
Ensure biennial visits to all main manufacturers by Airthings team	60%	Ensure that Airthings team members conduct visits to all main manufacturers at least once every two years to monitor compliance on ESG, SMETA corrective action plans, reinforce partnerships, and assess operational standards.	Three out of five main manufacturers have been visited within the last two years, including annual visits to our primary manufacturing partner. Site visits to the facilities in Malaysia and Israel have not yet been conducted, primarily due to resource limitations and other operational constraints.
Reduce high-risk supplier proportion to below 5%	40%	Through enhanced due diligence and corrective action plans, reduce the proportion of suppliers classified as high-risk from 12% (June 2024) to below 5%.	The proportion of high-risk suppliers has been reduced from 12% to 8% through targeted assessments and follow-up actions. Further reductions remain pending due to limited resources for expanded due diligence and engagement.
Maintain training and compliance in Human Rights and ESG standards	50%	Maintain the current rate of 95% training compliance among all employees on human rights, diversity, and ESG standards.	Training sessions were conducted on topics including information security, health and safety, and first aid. General awareness of policies and standards was reinforced during company-wide town halls. However, formal ESG and human rights training sessions were not held in the past year and are planned as a priority for the upcoming fall period.

Expand mapping of 3rd-tier suppliers and start their ESG assessment	0%	Extend comprehensive ESG mapping and assessments to cover important 3rd-tier suppliers in collaboration with our 2nd tiers, aiming for an increase in documented compliance and performance improvements across the entire supply chain.	No progress has been made on third-tier supplier mapping or ESG assessment during the reporting period, due to resource constraints preventing adequate supplier outreach.
Follow up on all SME-TA corrective action plans from main manufacturers	100%	Systematically track and ensure the implementation of all corrective action plans arising from SMETA audits of main manufacturers to uphold continuous improvement in compliance standards.	All SMETA audit corrective action plans have been closely monitored, with consistent follow-up to ensure full implementation and ongoing compliance with required standards.

Goals for next report

June 2026

Update due diligence assessment and include language regarding Transparency in all contracts above 200 KNOK

We aim to continue our due diligence assessments and ensure stronger alignment with transparency expectations. We will work to include updated clauses related to ESG transparency and ethical conduct for all contracts exceeding 200,000 NOK.

Reduce high-risk supplier proportion to below 5%

Reducing the share of high-risk suppliers remains a key target. Building on progress made, we will continue engagement and follow-up actions to bring the proportion below 5% in the upcoming period.

Maintain training and compliance in Human Rights and ESG standards

We will ensure that all employees remain informed and compliant with human rights, diversity, and ESG expectations. Formal training sessions will be resumed and integrated into our ongoing compliance efforts.

Ensure biennial visits to main manufacturers by Airthings team

To strengthen oversight and supplier relationships, we will continue scheduling on-site visits to all main manufacturers at least every two years. For those that have undergone SMETA audits, we will use these visits to follow up on corrective action plans. These engagements are essential for monitoring ESG performance and verifying audit outcomes.

Conclusion

Over the course of the reporting period, Airthings has made significant strides in enhancing the transparency and ethical standards of its supply chain. Through implementation of audits and site visits and the application of our Supplier Code of Conduct, we continue to work to improve supplier accountability and transparency. Notably, 100% of key suppliers have now been evaluated through a combination of public documentation reviews and direct questionnaires, ensuring alignment with our ethical and sustainability standards.

Despite these advancements, challenges remain, particularly with second and third-tier suppliers and in high-risk countries. These segments present complexities due to limited resources and the inherent difficulties of extending due diligence deeper into the supply chain. To address this, the Company will continue to expand our assessment framework and refine our outreach strategies, including the deployment of internal tools to better assess risk and the execution of more frequent and targeted audits for suppliers requiring improvement.

As we navigate the ongoing challenges of global supply chain management, our commitment remains steadfast: to uphold human rights, ensure decent working conditions, promote environmental responsibility, and conduct business with integrity. In the coming year, our goal is not only to close remaining gaps but also to ensure that the majority of our supply chain partners actively reflect our values. This continued focus is essential to maintaining our reputation as a responsible business and to driving positive impact globally.

This Transparency Act Report 2025 from Airthings is read and accepted by:

Audhild Randa

CTO - Transparency Act officer