



AIRTHINGS

Transparency Act Guidelines

March 2023

Airthings

Transparency Act Guidelines

Are you struggling to recall the Airthings sustainability KPIs from your introduction? It's okay, we forgive you. Below you can see our targets for 2026 that define our trajectory for Airthings' sustainability ambitions:



General Principles

At Airthings, we are focused on being a responsible business with outstanding conduct. We think every company should have responsible business as a guiding principle, but we won't get into that now. To accomplish this, we want to improve our internal projects, our operations, and the way we do business by using our sustainability key performance indicators, our Circular Principles, and our responsible business policies.

Assessing human rights in business and supply chains is of paramount importance for Airthings. Firstly, it ensures that Airthings suppliers and business partners uphold ethical standards and treat their workers and stakeholders with dignity and respect. By evaluating human rights practices, Airthings can identify and address potential abuses, such as forced labor, child labor, or unsafe working conditions. Secondly, assessing human

rights fosters transparency and accountability, enhancing a company's reputation and credibility. It also mitigates legal and financial risks associated with human rights violations. Lastly, by prioritizing human rights, businesses contribute to sustainable development and positively impact communities, fostering a fairer and more equitable global economy. Overall, assessing human rights in business and supply chains is crucial for ethical, legal, and social reasons, benefiting both companies and society as a whole.

Information about the Transparency Act and Airthings compliance

Briefly about Airthings

Compliance Transparency Act has been drawn up for the Company. The Company consists of the following: Airthings ASA with registration number 993 092 045 and address Wergelandsveien 7, 0167 Oslo (hereinafter referred to as "Airthings" or "the Company"). Airthings complies within the Norwegian Transparency Act

The Act sets out strict requirements for the working relationship and human rights in companies.

- The purpose of the Act is to promote respect for human rights and decent working conditions in companies and imposes a duty on companies to inform and publish how they work to ensure human rights and decent working conditions.
- The law imposes an information obligation on larger enterprises: You can send information requests about how Airthings complies with the Norwegian Transparency Act, to which the Company must normally respond within three weeks, and the companies are required by law to carry out due diligence assessments that must be made public every year.

The Transparency Act is a law that the vast majority of companies with operations in or to Norway have to comply with - either by the law imposing obligations directly to these companies, or by the companies' business partners and suppliers being imposed obligations under the law.

Brief about key legal requirements for Airthings

Main laws:

[The Transparency Act](#): Lovdata has updated the version of the Transparency Act (Lovdata also has an English version of the Transparency Act).

[Accounting Act with regulations](#): Lovdata has an updated version of the Act on annual accounts etc. (Accounting Act).

Other relevant laws/regulations:

The Working Environment Act: Act on the working environment, working hours and job security etc. (Working Environment Act), LOV-2005-06-17-62 with regulations

The Personal Data Act: Act on the processing of personal data (the Personal Data Act), LOV-2018-06-15-38 with regulations which in § 1 make the EU's general data protection regulation called GDPR a Norwegian law

Equality and Anti-Discrimination Act: Act on Equality and Prohibition of Discrimination (Equality and Anti-discrimination Act), LOV-2017-06-16-51 with regulations.

Act on the Protection of Commercial secrets: Lovdata has an updated version of the Act on the Protection of Commercial Secrets.

Environmental Information Act: Lovdata has updated the version of the Act on the right to environmental information and participation in public decision-making processes of importance for the environment (Environmental Information Act).

The Human Rights Act: Lovdata has an updated version of the Act on Strengthening the Position of Human Rights in Norwegian Law (Human Rights Act).

Airthings also report on how the Company follows up on its social responsibility.

To whom the law applies

The Transparency Act applies to larger enterprises, either with a business address in Norway, or foreign companies that offer goods and services in Norway and are liable to tax in Norway.

Companies that are either covered by Section 1-5 of the Accounting Act, i.e. public limited companies and other companies subject to accounting obligations whose shares, shares, capital certificates or bonds are listed on a stock exchange, authorized marketplace or equivalent regulated market abroad, as well as other companies if stipulated in regulations.

Businesses that exceed the limits for at least two of the following three conditions are also considered larger enterprises:

- Sales revenue of over NOK 70 million.
- Balance sheet over NOK 35 million.
- The average number of employees in the financial year is over 50 full-time employees.

Airthings is covered by this Act since at least two conditions are met.

Smaller enterprises can be affected by the law - this applies in particular to those companies that are suppliers to larger enterprises, and who in that connection may face demands to live up to the same standards.

Obligation to provide information according to The Transparency Act

From 1 July 2022, everyone has the right to demand information about how Airthings handles negative consequences on basic human rights and decent working conditions

- Requests for information must be made in writing. This can, for example, be done to the Airthings by sending an e-mail to this e-mail address transparency@airthings.com
- A request for information does not have to be justified, but a justification from the information seeker can contribute to a more comprehensive response to the request
- The right to information includes both general information about how Airthings handles negative consequences, and specific information relating to goods and services

Businesses covered by the Transparency Act must inform anyone who requests it in writing about the analysis of risk and the measures implemented in the event of any findings of violations in connection with basic human rights and decent working conditions. Information must, as a general rule, be given in writing, be comprehensive and understandable. The Act imposes companies a duty to provide information within a reasonable time, and no later than three weeks after the inquiry was received.

Refusal of requests for information

Companies that are covered by the Transparency Act must initially respond to all requests for information on how the Company handles negative consequences for basic human rights and decent working conditions.

Any company can, in accordance with the Transparency Act, refuse information requests in the following cases:

1. The claim does not provide a sufficient basis for identifying what the claim applies to.
2. The demand is obviously unreasonable.
3. The requested information concerns information about someone's personal circumstances.
4. The requested information relates to information about technical devices and methods or other operating or business conditions which it would be competitively important to keep secret for the sake of the information concerned.
5. The Company has no obligation to give information that is classified pursuant to the Security Act or protected pursuant to the Intellectual Property Rights Act.

Duty to carry out due diligence assessments

Airthings will carry out due diligence assessments which are reported and made public. The first report will be available from this website by 30 June 2023.

The Act imposes companies to submit a report every year, by 30 June, that explains the due diligence assessments that the company has carried out.

- Due diligence assessments mean that Airthings has to obtain an overview of, as well as analyze, the risk of violations of basic human rights, and uncover unacceptable working conditions within Airthings but also assess our supply chain and business partners.

- Airthings is responsible for stopping, reducing, or preventing negative impact on the working relationship and basic human rights, both within Airthings, with suppliers and other business partners.
- The due diligence assessments must be carried out regularly and in line with guidelines from the OECD. Airthings will also carry out assessments of conditions at subcontractors and other business partners.

Reporting of adverse impact on basic human rights and decent working conditions

If someone discovers a breach of security or incidents that could have an impact on security, report it immediately to the Transparency Officer at Airthings.

Airthings has carried out an assessment which concludes that Airthings is covered by the Transparency Act.

If the Company does not fulfill its obligations under the Transparency Act, you can submit a Complaint for breach of the Transparency Act's obligation to provide information ([link to the Norwegian Consumer Authority's form](#)).

First, any complaints should be addressed to the Company. Contact information for the Transparency Officer at Airthings is: transparency@airthings.com

Basic principles

The company's work with human rights and social responsibility must follow these basic principles.

In accordance with Section 1 of the Transparency Act, the Company shall work as follows with respect to human rights and social responsibility:

- promote companies' respect for basic human rights and decent working conditions in connection with the production of goods and the provision of services, and
- ensure the general public has access to information about how companies deal with negative consequences for basic human rights and decent working conditions.

The management of Airthings is responsible for and must be able to demonstrate that the above-mentioned principles are observed by Airthings.

The management must ensure that this work in the future also takes place so that requirements for employees in the Company are taken care of, and this can be achieved by the Company through internal HSE controls in accordance with the Working Environment Act.

The management must ensure that this work in the future also takes place so that all collection and other processing of personal data can only take place for specific and legitimate purposes and so that the rights of employees and other data subjects according to the privacy regulations are safeguarded, and this Airthings can achieve

through internal control GDPR according to the Personal Data Act.

The management has also adopted this as part of its goals and strategies:

- Environment, human rights, sustainability and social responsibility are included in the company's strategy and overall goals.
- The Company may report on its social responsibility beyond the minimum requirements in Norwegian law, and this must be easily accessible to anyone on the Company's website.
- The Company may inform its employees on the intranet or in the personnel handbook about how employee rights are safeguarded. The Company must offer employees and others who visit the Company a safe and developing workplace. In order to achieve this, the Company must work continuously with measures and processes related to health, environment and safety, including providing training and support to managers and employees so that they can be developed as best as possible. The Company wants to look after employees as well as possible and regardless of gender, age or background.
- The Company's guidelines for ethics and social responsibility should be made known to all employees.
- The Company may also report on social responsibility according to the Accounting Act's rules for large companies, regardless of whether the Company is considered to fall under such a reporting obligation or not.
- The Company should aim to have routines for anti-money laundering and anti-corruption, both internally and with Company partners and in the supply chain.
- The Company should actively work to safeguard and fulfill the UN's sustainability goals, including, but not limited to, the goals of smaller inequalities, ensuring equality between the sexes, stopping climate change and responsible consumption and production.

Briefly about roles according to the Transparency Act

The following tasks/responsibilities fall under the **Transparency Officer**, see also Part 1 Section 5 below:

- Ensure that Airthings carries out the due diligence assessments mentioned in this internal control to ensure and demonstrate that Airthings complies with the applicable regulations. The measures must be reviewed regularly (at least annually before the deadline of 30 June) and must be updated if necessary.
- Ensure that Airthings fulfills the applicable information requirements and disclosure obligations under the Transparency Act.
- Cooperate with the Norwegian Consumer Authority and other authorities in connection with inspections, complaints or the like related to the Transparency Act, environmental protection or human rights relevant to Airthings.

The following tasks/responsibilities fall under the **Sustainability Manager**:

- Ensure compliance with Transparency Act obligations requirements, including the development and implementation of systems for collecting and reporting relevant data and information, and ensuring accuracy and completeness in company reporting.
- Develop and implement policies, procedures, and guidelines related to human rights and environmental due diligence, including sourcing, manufacturing, and distribution processes.
- Conduct risk assessments and impact assessments to identify and prioritize areas of potential human rights and environmental impact within the company and its supply chain.
- Engage with suppliers and other relevant stakeholders to gather information and assess compliance with relevant standards, laws, and regulations.
- Monitor and report on the company's performance in relation to human rights and environmental due diligence, including through the development of key performance indicators and the tracking of progress against established targets.

The following tasks/responsibilities fall under the **Supply Chain Manager**:

- Collaborate with the sustainability team to develop and implement programs and initiatives that promote the continuous improvement of human rights and environmental performance within the supply chain.
- Engage with suppliers and other relevant stakeholders to gather information and assess compliance with relevant standards, laws, and regulations, including those related to the Transparency Act.
- Work with the product design team to identify and select suppliers that meet the company's standards for human rights and environmental performance.
- Monitor and report on the Company's supply chain performance in relation to human rights and environmental due diligence, including through the development of key performance indicators and the tracking of progress against established targets. This may include the collection and analysis of data for transparency reporting purposes, and the development of reporting materials that are accurate, complete, and timely.
- Participate in industry events and forums to stay up to date on best practices and developments in the field of human rights and environmental due diligence.

The following tasks/responsibilities fall under the **Enterprise Architect** (also called **IT Manager**):

- Implement suitable measures, as mentioned in this internal control, to achieve a level of security that is sufficient in terms of the safety of employees and the end users who use the Company's solutions.
- Be responsible for everything Airthings acquires from IT solutions, including suppliers who assist with support and operations that affect employees in Airthings.
- Assist the Transparency Officer when necessary for IT technical clarifications. Answer questions to the IT Manager in Due Diligence Assessments.

The following tasks/responsibilities fall under the **HR Director**:



- Hold supreme responsibility for employees in the Company. Overall responsibility for ensuring that employees' human rights are safeguarded, including that the employees' personal data is processed within the applicable regulations in the Working Environment Act and the Personal Data Act.
- Be responsible for solutions that are acquired to measure satisfaction among the employees or other special tools that HR in Airthings uses on applicants and employees.
- Answer questions to the HR Director in Due Diligence Assessments.
- Be responsible for ensuring that physical products that Airthings acquires for the office location, including food, drink and office equipment (that do not fall under the responsibility the IT Manager).
- Answer questions related to the HR Director in the due diligence assessments as specified in the document "Checklist Due Diligence Assessment - Airthings".
- Physical security so that human rights and social responsibility can be safeguarded. Supreme responsibility for fire safety at the location (office or other building where employees can stay at or in).

The following tasks/responsibilities are under the responsibility of the **Safety Representative**:

- Keep up to date with the regulations on human rights and social responsibility
- Check the Company's compliance with human rights for employees in the Company
- Advise the Company on possible measures or views on draft due diligence assessments.
- Prioritize efforts where the risk of human rights violations within the Company is highest.
- Act as a contact point for claims from employees or other persons under the Transparency Act.
- Answer questions to the Protection Commissioner in Due Diligence Assessments.

Instruction about the internal responsibility roles at Airthings

Airthings' review of the Transparency Act and related requirements

This instruction refers to the top management at Airthings and the Transparency Officer. The "top management" refers to the board of Airthings ASA.

The top management at Airthings must annually review the objectives, strategy and organization of the internal control system used by Airthings. The top management at Airthings must check that these are in accordance with the minimum requirements in Norwegian law in addition to the needs of Airthings. The top management at Airthings must request that the Transparency Officer update objectives, strategy and organization when necessary.

Airthings' overarching goals and strategy for this are published on Airthings' website in

accordance with the requirements set out in the Transparency Act. Airthings' commercial secrets, and personal matters must not be published on Airthings' website.

Corrective measures are followed up by reviewing the results of self-inspection and non-conformity treatment and comparing them with the corrective measures.

Responsibilities

The top management at Airthings has the overall responsibility for ensuring that Airthings complies with the applicable requirements in the Transparency Act and other human rights relevant to Airthings. In the top management's review, the elements governing internal control and the obligations under the Transparency Act must be revised annually if necessary.

The Transparency Officer is responsible for facilitating the review. The Transparency Officer is also responsible for preparing targets and strategies for the Compliance Transparency Act as well as preparing appropriate routines. The Transparency Officer is also responsible for ensuring that the routines are followed.

Execution of the top management's review

What the Transparency Officer must present to the top management

The Transparency Officer must annually and in reasonable time before 30 June present the results of the following assessments:

- Due diligence assessments relevant to Airthings itself with business partners and supply chains
- Improvement measures with a plan for implementation

Review of adverse impacts and incidents

The top management at Airthings goes through the most serious adverse impacts and incidents that have occurred throughout the year in detail, and a summary of the less serious ones. Causes of adverse impacts and incidents as well as handling of such incidents and adverse impacts should be discussed.

Improvement measures

The improvement measures must be approved by Airthings' top management.

Instructions to the Transparency Officer

Reporting

The Transparency Officer reports to the top management of the Company at least

annually in the top management's latest meeting with the management before publication on the Company's website by the deadline of 30 June.

Areas of responsibility

The Transparency Officer is the immediate superior for the other roles mentioned in this Part 1 section 3.3. of this document and in connection with other roles in Airthings that work with the Transparency Act: Sustainability Manager, Supply Chain Manager, Enterprise Architect (also called IT Manager), HR Director and Safety representative.

The **Transparency Officer** is responsible for the following areas:

- Ensure that the Company has sufficient documentation internally and on its own websites regarding requirements in the Transparency Act, including that requirements for human rights, the environment and transparency are followed internally for employees and made to suppliers in the Company's supply chain.
- Sign due diligence assessments to document that such risk assessment has been carried out by the deadline each year. Ensure that the applicable routines, safety regulations, instructions, information requirements and due diligence assessments are followed by the Company internally and externally.
- Ensure that delegated areas of responsibility are followed by the person or persons who have been assigned areas of responsibility from the Transparency Officer.
- Ensure that adverse impacts are handled in accordance with the applicable regulations and the Company's routines, including ensuring that supervisory authorities and others respond within statutory deadlines.

Signature

The instructions for the Transparency Officer have been read and accepted:

Version 1.0, March 2023

Approval:

Audhild Randa

CCO - Transparency officer

Signature:



Next Review: March 2024



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Live better.