

Transparency Act Report 2026

Nordic Technology Group AS

1. Introduction

This human rights due diligence report has been prepared by Nordic Technology Group AS (NTG) pursuant to Section 5 of the Norwegian Transparency Act (Nw: åpenhetsloven). The report covers the period from 1 January 2025 to 31 December 2025.

2. Structure and operations

NTG is an industrial technology group holding majority ownership in four companies. NTG's shares are traded on Oslo Euronext Growth.

NTG is organized in three technology business areas (% shareholding):

- *Sensor*: Wavetrain Systems AS (74.2%) and Hammertech AS (75.5%)
- *Clean*: MossHydro AS (89.9%) and Hystorsys AS (100.0%).

NTG's strategy is to drive value creation and realization through disruptive technology with large growth markets, and a clear ESG profile.

The subsidiaries of the NTG group are largely in an early commercial growth phase and not fully operational. Thus, the group had in 2025 limited business activity as well as a limited number of suppliers. MossHydro, the most mature subsidiary, develops and produce filters designed for industrial solutions and water treatment systems. Further, Hammertech, which specialises in measuring instruments within the oil and gas industry, has in 2025 continued the commercial growth phase, whilst Wavetrain Systems is expected to reach a full commercial phase in 2026.

NTG's headquarters are located in Oslo, and the consolidated group had 46 employees as of 31 December 2025, including three at the parent company.

3. Commitments to human rights and ESG

NTG is firmly committed to upholding ESG principles and conducting business in an ethical and responsible manner. This includes a clear commitment to respecting and promoting fundamental human rights and ensuring decent working conditions across our operations. We expect the same standards to be upheld by our suppliers and business partners.

ESG considerations are integral to NTG's overall strategy and guide our approach to sustainable value creation. Our focus areas include: (i) maintaining high standards of business ethics and regulatory compliance; (ii) fostering a strong culture, supporting our people, and contributing positively to the communities in which we operate; (iii) conducting our activities in a way that reflects our commitment to environmental sustainability; and (iv) systematically identifying, assessing, and managing business risks and opportunities. For more information, please visit www.ntechgroup.no.

4. Responsibilities and routines

The Board of Directors of NTG has the overall responsibility for the Company's ESG commitments and for ensuring compliance with the requirements set out in the Norwegian Transparency Act. Day-to-day oversight of these matters is delegated to the CEO and CFO, who work in close coordination with subsidiary management and relevant group functions.

NTG's commitment to ESG and respect for human rights is embedded in its governing policies, including ethical guidelines adopted by the subsidiaries and a Group supplier code of conduct. The subsidiaries have implemented recognised management systems and obtained relevant certifications, including ISO 9001 (Quality Management) and ISO 14001 (Environmental Management). In addition, whistleblowing procedures have been established in accordance with the Norwegian Working Environment Act, providing channels for reporting concerns related to human rights, working conditions, and other compliance matters.

Given the Group's relatively limited size, with a modest number of employees and suppliers, NTG benefits from short communication lines. This facilitates effective identification, assessment, and management of risks related to human rights and decent working conditions.

5. Situation and measures among own employees

The NTG group generally maintains a positive working environment. The group companies recorded low sick leave in 2025, and there were no injuries or accidents reported at the workplace within the group companies. We strive for NTG to be a workplace where full equality between women and men is realized, and to ensure that there is no discrimination based on gender or other grounds in matters such as pay, advancement, recruitment, etc. For further information, please refer to NTG's Directors' report included in the 2025 annual financial statements.

6. Measures in relation to investments

NTG has embraced a responsible investment approach, where ESG factors are integrated into investment decisions. This approach aids in risk management and the generation of sustainable, long-term returns. When contemplating a new investment, we always consider these key factors:

- *Environmental factors:* We assess the impact of a company's operations on the natural environment, from carbon footprint to waste management and water conservation.
- *Social factors:* We examine how a company manages its relationships with employees, suppliers, customers, and communities. This encompasses issues like human rights, labour standards, and diversity and inclusion.
- *Governance factors:* We focus on a company's governance structure, including aspects such as corporate structure, executive remuneration, and business ethics.

7. Situation and measures in supply chain

During 2025, NTG conducted a review of its supplier code of conduct and concluded that no amendments were required following its introduction in 2023 and subsequent review in 2024. The Company continues to evaluate and enhance its procedures for the assessment and monitoring of suppliers and business partners, including with respect to human rights and decent working conditions.

In addition to ongoing assessments conducted prior to and throughout supplier relationships, NTG performs an annual risk assessment to identify potential and actual adverse impacts on fundamental human rights and working conditions within its supply chain and among business partners. The assessment is based on internal guidelines informed by recognised frameworks, including the OECD Due Diligence Guidance. Key evaluation criteria include geographic and industry risk, the likelihood and severity of potential impacts, and NTG's degree of connection to such risks. The most recent assessment, conducted in mid-2025, covered the Group's supplier base.

NTG maintains a relatively limited and concentrated supplier base, enabling close oversight and regular dialogue. Suppliers primarily provide services such as consultancy, technical support, IT and software, insurance, financial services, intellectual property-related services, and office facilities, and are predominantly based in Norway. Industrial suppliers, though limited in number, are mainly associated with the operations of MossHydro, Hammertech, and Wavetrain Systems, and are generally well-established and reputable counterparties. MossHydro's principal supplier is a leading participant in the Norwegian water treatment industry and is itself subject to the Norwegian Transparency Act. The remaining suppliers are likewise established companies with relevant governance frameworks, procedures, and policies in place.

Based on the assessments performed, the risk of adverse impacts on human rights and decent working conditions within NTG's supply chain is considered low. The most recent review did not identify any actual adverse impacts or material risks requiring measures beyond the Company's standard supplier management and due diligence procedures.

This report pertains to the financial year of 2025. Nonetheless, we underscore that due diligence and the commitment to human rights are ongoing endeavors within the NTG group.

For more information on the subsidiaries of the NTG group, please visit www.ntechgroup.no.

Oslo, 12 May 2026

/s/
Henrik August Christensen
Chairman

/s/
Konstantinos Koutsoumpelis
Board member

/s/
Georg Johan Espe
Board member

/s/
Leif Rune Rinnan
Managing Director