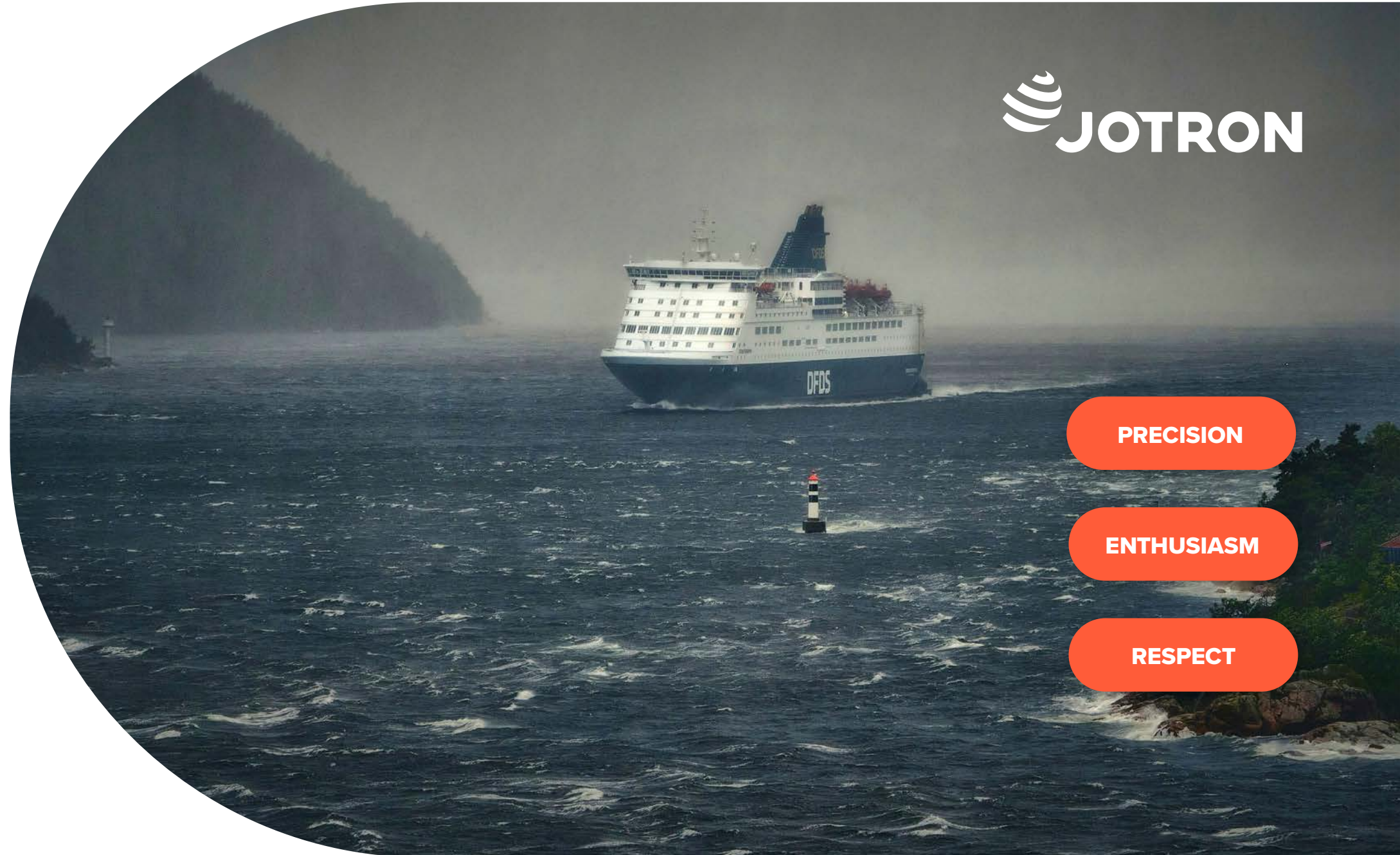


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PRECISION

ENTHUSIASM

RESPECT

Introduction

About Jotron

Jotron develops and manufactures state of the art communication and navigation solutions for land, sea and air applications worldwide. Our solutions enhance safety through excellent technology.

Jotron is a privately owned company based in Larvik, Norway. We have a team of 418 employees spread across offices in Norway, Lithuania, Singapore, Netherlands, UK and USA. We are dedicated in developing and manufacturing communication products and systems for use in air, on land and at sea. For us, **“Safe Journey!”** is more than just a marketing tagline – it is our mission and responsibility. It serves as a reminder that what we do plays a vital role in safety systems worldwide. Aiming for excellence in everything we do, Jotron is certified in accordance with ISO 9001, 14001, 27001 and 45001.

For almost 60 years, Jotron has consistently delivered lasting product value to the industry and our customers. Founded in 1967, the company developed the world’s first Emergency Position Indicating Radio Beacon (EPIRB), which was launched in 1970. While we have successfully ventured into new markets, we remain focused on developing industry-leading products by leveraging the most advanced technologies.

Jotron is recognised globally as a leading provider of high-performance communication and navigation equipment. Our products are trusted worldwide, and we are continuously expanding into new and dynamic markets. What sets us apart in the industry is our complete control over the entire product chain – from initial concept and production to market delivery. Our robust and well-established product portfolio offers critical communication and navigation solutions designed to perform reliably, even in the most challenging environments.



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Business highlights

1081

REVENUES IN
NOK MILLION

149.2

tCO₂e EMISSIONS
IN SCOPE 1 & 2



6

COUNTRIES WITH
OPERATIONS¹⁾

418

EMPLOYEES

1) Norway, Lithuania, Netherlands, US, UK, Singapore

Message from the managing director

Advancing our commitment to sustainability

2025 was a year of strong progress and strategic development for Jotron. Our revenue passed one billion NOK for the group, reflecting robust organic growth alongside the strategic acquisitions of MEP B.V. and AD Navigation. These acquisitions expand our capabilities within maritime navigation and complete our portfolio within the ATC segment.

With growth comes responsibility. For us, this includes being transparent about our sustainability performance and the impact we have. Therefore, we have chosen to voluntarily and gradually align with the European Sustainability Reporting Standards (ESRS). In 2025, we completed a full quantification of all material Scope 3 greenhouse gas emissions, providing a stronger basis for targeted reductions. We also strengthened our due diligence procedures to further embed environmental and social considerations across our value chain.

The 2025 launch of TronTracker, our new system for tracking fishing gear, shows how focused innovation can address real environmental challenges. By preventing ghost fishing, reducing marine pollution, and lowering fuel use during gear recovery, it supports more sustainable fishing operations.

Our progress is made possible by the dedication of our diverse workforce and the trust of our customers. By staying true to our values and continually enhancing our technology, we remain committed to a more sustainable future for critical communication and maritime safety.

Merete Berdal
Managing director of Jotron



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BASIS FOR PREPARATION

The sustainability statement has been guided by the requirements of the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS). Two companies were acquired during 2025. Jotron MEP B.V, acquired in May 2025, is included in both the financial and sustainability reporting scope. AD Navigation AS, acquired in December 2025, is included in the financial consolidation but is not included in the 2025 sustainability report due to the acquisition taking place shortly before year-end in 2025. AD Navigation will be incorporated into the sustainability reporting boundary from the 2026 reporting cycle.

The sustainability statement is prepared on a consolidated basis, comprising the parent company Jotron AS and all subsidiaries apart

from AD Navigation. The report covers the period 1 January 2025 to 31 December 2025. Except for the temporary exclusion of AD Navigation, the consolidation scope is the same as for the financial statements. Both upstream and downstream value chains are covered. All disclosures included are either mandatory under the ESRS or have been assessed as material through our double materiality assessment. Jotron has not used the option to omit any sensitive information related to intellectual property, know-how or innovation in this sustainability statement.

SUSTAINABILITY GOVERNANCE

Jotron has established procedures to address material impacts, risks and opportunities. Jotron does not currently integrate sustainability-related performance in our incentive schemes.

BOARD OF DIRECTORS

Sustainability is considered at the highest level of decision-making. The board of directors oversee material impacts, risks and opportunities. The annual sustainability report is reviewed and approved by the board. On 31 December 2025, the board comprised the chair and 6 directors, with a gender distribution of 57 per cent women and 43 per cent men. Worker directors make up 29 per cent of the board, consisting of two women. Independent directors account for 43 per cent of the board, consisting of one woman and two men. The board of directors have extensive experience and knowledge in finance, strategy, business development, and engineering. All directors are non-executive.

Corporate management team

The corporate management team, led by the managing director, receives monthly updates on sustainability matters from the sustainability director. Reporting directly to the managing director, the sustainability director has been delegated responsibility for monitoring impacts, risks and opportunities, as well as leading the development and implementation of sustainability strategy and reporting. Each division and department director is accountable for managing sustainability performance in their respective areas. The corporate management team possesses expertise and responsibilities within finance, ESG, HR, operations, quality, R&D, information security, sales and marketing.

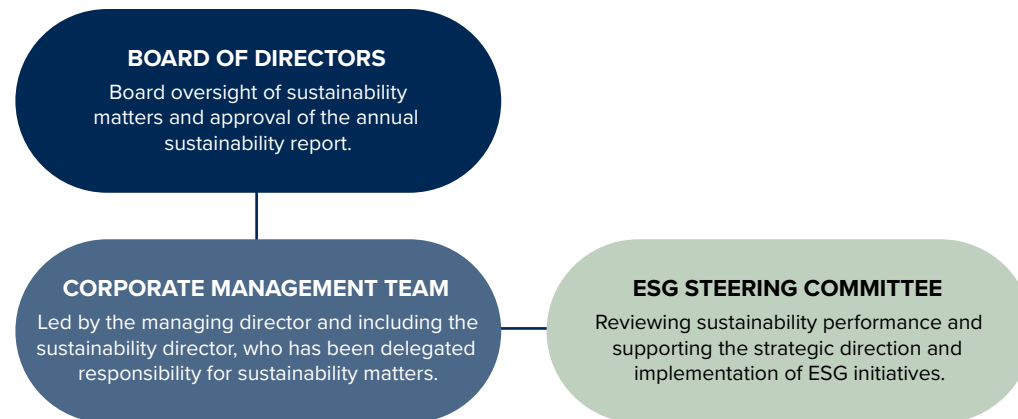


ESG steering committee

At the start of 2025, Jotron formed an ESG steering committee, including members of the corporate management team and the procurement manager. The committee actively participates in the assessment and prioritisation of material impacts, risks and opportunities, and will play a crucial role in the development of Jotron's transition plan scheduled for 2027.

Risk management

Jotron acknowledges the potential for material misstatements in sustainability reporting due to human error or incomplete data. To ensure efficient and accurate carbon footprint accounting, Jotron has implemented software that complies with the Greenhouse Gas (GHG) Protocol and enhances



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data integrity and accuracy. Jotron will establish additional procedures to further minimise the risk of misstatements.

Due diligence

The table below summarises how we address the core elements of due diligence in our sustainability statement.

CORE ELEMENTS OF DUE DILIGENCE		
a)	Embedding due diligence in governance, strategy and business model	Fully or partially addressed for our material sustainability matters in the different sections of this sustainability statement. For ESRS S1 and S2, also see our transparency statement on human rights due diligence, available on our website.
b)	Engaging with affected stakeholders	
c)	Identifying and assessing adverse impacts	
d)	Taking actions to address those adverse impacts	
e)	Tracking the effectiveness of these efforts and communicating	

OUR BUSINESS MODEL AND VALUE CHAIN

How we create value

Committed to providing safe journeys and operations, Jotron serves customers globally from offices in Larvik (Norway), Oslo (Norway), Tønsberg (Norway),

Kaunas (Lithuania), Amsterdam (Netherlands), Cramlington (UK), Houston (Texas, US) and Singapore. We are proud to employ 418 talented individuals across these locations.



RESOURCES	BUSINESS ACTIVITIES	VALUE CREATION
<p>People and culture</p> <ul style="list-style-type: none"> A highly skilled workforce and strong corporate culture built on enthusiasm, respect and precision <p>Natural resources</p> <ul style="list-style-type: none"> Dependency on natural resources such as metals, minerals, and fossil fuels for electronic components, batteries, and plastics <p>Financial strength</p> <ul style="list-style-type: none"> A solid capital structure that supports innovation and operational flexibility <p>Relationships</p> <ul style="list-style-type: none"> Strong relationships with customers, suppliers and other key stakeholders 	<p>Marketing and sales</p> <p>Development</p> <p>Procurement</p> <p>Warehousing</p> <p>Production</p> <p>Order and delivery</p> <p>After sales and support</p> <p>Project management</p>	<p>Customers and end-users</p> <ul style="list-style-type: none"> Providing safe operations and making journeys safer and more reliable for anyone travelling on land, by sea and in the air <p>Employees, shareholders and society</p> <ul style="list-style-type: none"> Value for employees through meaningful work, security, and belonging Shareholder value through long-term value creation Societal value through community engagement



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OUR MARKETS			
ATC Airports and towers Area control centres Remote towers Airlines	COASTAL Offshore installations Port authorities Inland waterway transport Coastal surveillance	ENERGY Offshore installations Oil and gas Renewable energy	MARITIME Commercial vessels Leisure boats Governmental vessels

OUR PRODUCTS				
MARITIME COMMUNICATION Maritime communication products, including EPIRB ¹⁾ , AIS ²⁾ , and GMDSS ³⁾ systems, ensuring safety and effective communication for vessels and offshore installations. Additionally, PLBs ⁴⁾ are locating and assisting individuals in emergencies.	MARITIME NAVIGATION Maritime navigation products, including GNSS positioning system, echo sounders and speed logs, ensure accurate navigation vessel safety by providing precise positioning calculation, depth measurements and speed data. This information is essential not only for safe navigation, but also for achieving optimal consumption by supporting efficient voyage planning.	RADIO VHF ⁵⁾ and UHF ⁶⁾ radios for air traffic control, vessel traffic service, and coastal and offshore communication. These radios ensure reliable communication in congested areas and harsh environments, featuring advanced digital signalling and full voice over IP functionality.	RECORDING Advanced recorder products, including the Ricochet recorder and SmartOil ⁷⁾ recording system. These systems capture, replay, and analyse communication data for air traffic control, vessel traffic service, and offshore operations, ensuring comprehensive incident reconstruction.	VOICE COMMUNICATION SYSTEM Essential voice communication systems for critical aviation and maritime industries and applications. Combining innovation with convenience, and systems that revolve around optimal human interaction.

1) Emergency Position Indicating Radio Beacon

2) Automatic Identification System

3) Global Maritime Distress and Safety System

4) Personal Locator Beacon

5) Very High Frequency

6) Ultra High Frequency

7) Safe Maritime ATC Recorder Technology - Offshore Industrial Level

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OUR STRATEGY

Thriving in the circular and decarbonized economy, with ethical integrity

Sustainability is a strategic focus in Jotron's business strategy. Jotron's sustainability ambition is to thrive in the circular and decarbonised economy, while promoting fair and ethical business practices. Based on the material sustainability topics, Jotron has defined four strategic sustainability pillars; circularity, decarbonisation, inclusion and responsibility. All four sustainability pillars are closely interconnected.

STAKEHOLDER GROUPS

Jotron engages with a broad range of stakeholders whose insights contribute to shaping our sustainability priorities and strategic direction. Nine key stakeholder groups were identified during the double materiality process in 2024. Stakeholder groups are monitored through ongoing dialogue across the value chain, ensuring that our understanding of impacts, risks and opportunities reflects both internal and external expectations. Through this report, we aim to provide stakeholders with a clear and accessible overview of our sustainability work.

Engaging in customer dialogue is integral to our daily operations, ensuring we meet their needs effectively. Customer ESG surveys and requirements provide valuable insights into their expectations regarding sustainability. Additionally, we have conducted two customer interviews focused on the ESRS list of sustainability matters.

Employees' views are considered through daily interactions, performance and development dialogues, and surveys on diversity,

equity and inclusion. Jotron has formed a sustainability working group that has participated in workshops on ESG topics. In addition, a selection of employees has completed a comprehensive survey on the ESRS list of sustainability matters. Insights have also been gathered through meetings and interviews with key personnel. Management has been involved in the prioritisation of material impacts, risks and opportunities.

A selection of suppliers has received surveys to identify potential and actual impacts on working conditions and human rights. At the start of 2025, Jotron launched the Speak Up Channel on our website to enable customers, suppliers and other external stakeholders to report concerns. Reports from this channel are handled by Jotron's Speak Up Board and reported to the corporate management team if necessary. This ensures that stakeholder perspectives are considered in strategic discussions, risk assessments and the development of objectives, targets and programmes.

DOUBLE MATERIALITY ASSESSMENT

The double materiality assessment is reviewed at least annually. The most recent review, conducted in 2025, resulted in one adjustment to the assessment.

In 2024, we conducted the first double materiality assessment with reference to the criteria in ESRS 1. The double materiality approach had two dimensions of materiality; impact materiality and financial materiality. Impact materiality focuses on the company's material actual or potential, positive or negative impacts on people and the environment over the short-, medium- and long term



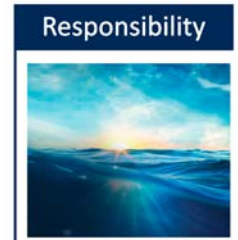
Prolonging product lifetime, minimising resource use and reducing waste



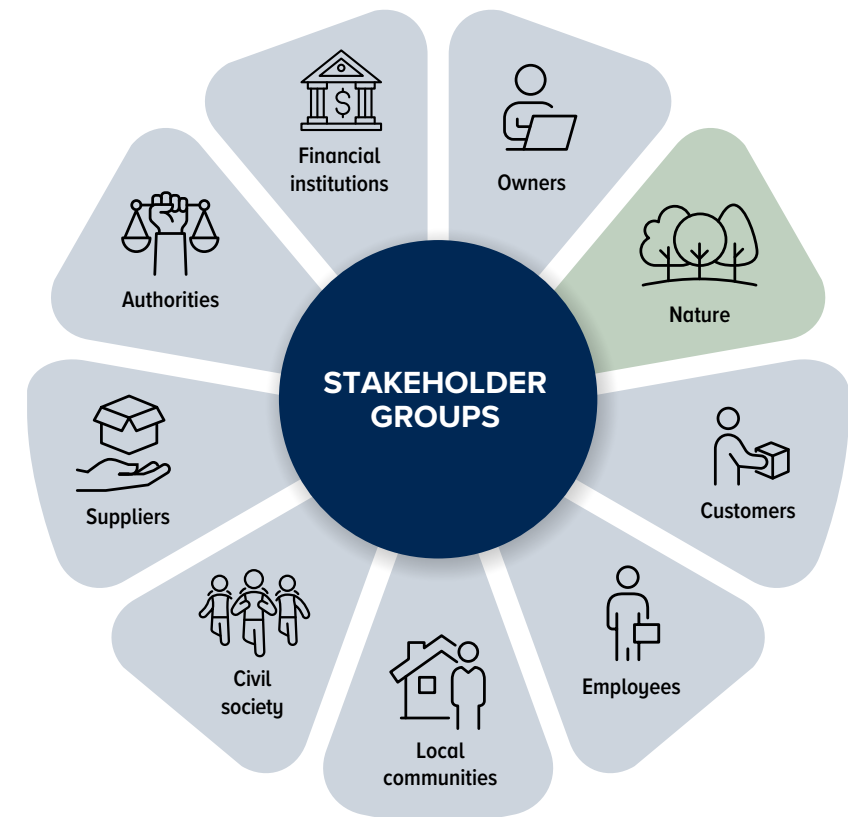
Decarbonising our own operations and the value chain, including enhancing energy efficiency



Fostering a diverse, inclusive workspace with equal opportunities for all



Upholding strong business culture with a responsible value chain throughout



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(inside-out perspective). Financial materiality focuses on risks and opportunities that could reasonably be expected to have material financial effects on the company (outside-in perspective).on the company (outside-in perspective).

METHODOLOGY

1 – Understand

To better understand our business context, we analysed activities across the entire value chain, including both upstream and downstream activities. Additionally, we conducted a stakeholder analysis to identify those who may be affected by our business activities and those interested in our sustainability performance.

2 – Identify

Impacts, risks and opportunities were identified through assessments of environmental, social and governance matters. To ensure completeness, we used the list of sustainability matters in ESRS 1 as a basis. Furthermore, to address entity-specific sustainability matters relevant

to our industry, we assessed sustainability matters in the SASB Standards for Technology & Communication. The identification of impacts considered both positive and negative, direct and indirect impacts on people and planet resulting from our business activities. The identification of risks and opportunities considered both past and future events.

3 – Prioritise

The identified impacts, risks and opportunities were assessed for materiality. Risks and opportunities were assessed based on their magnitude and likelihood. Potential impacts were assessed based on their severity and likelihood. Severity was determined by examining the scale and scope of the impacts. For negative impacts, the irremediable character was also considered. All factors determining materiality were assigned a score from 1 to 5, in accordance with our established risk management framework. Scores deemed material resulted in classifications of high, medium or low materiality.



- High materiality
- Medium materiality
- Low materiality
- Not material
- High materiality
- Medium materiality
- Low materiality
- Not material



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MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

In 2025, we refined our materiality assessment to reflect expanded value-chain data and updated stakeholder input. Following the review, we concluded with 6 mate-

rial sustainability topics and 14 sub-topics, including 1 entity-specific sub-topic. Material impacts, risks and opportunities are defined for each material topic.

MATERIAL SUSTAINABILITY TOPICS

TOPIC	SUB-TOPIC	MATERIALITY
ENVIRONMENT		
ESRS E1 Climate change	Climate change mitigation	High
	Climate change adaptation	Low
	Energy	High
ESRS E5 Resource use and circular economy	Resources inflow, including resource use	Medium
	Resources outflows related to products and services	High
	Waste	Medium
SOCIAL		
ESRS S1 Own workforce	Working conditions	High
	Equal treatment and opportunities for all	High
ESRS S2 Workers in the value chain	Working conditions	Medium
	Other work-related rights	Medium
ESRS S4 Consumers and end-users	Personal safety of consumers and/or end-users	Medium
GOVERNANCE		
ESRS G1 Business conduct	Corporate culture	High
	Corruption and bribery	Medium
	Cybersecurity (entity-specific)	Low

In March 2025, Jotron launched a technology system for marking and tracking fishing gear, which helps prevent ghost fishing. Although the technology has a positive environmental effect, it represents a small part of our product portfolio, and the associated impacts are currently limited. ESRS E4 Biodiversity and ecosystems is therefore assessed

as immaterial for the 2025 reporting year and is the only change in our materiality assessment compared with 2024. If this technology expands in scale or becomes a more significant part of our portfolio in the future, the topic may become material in subsequent reporting cycles.



IMPACTS, RISKS AND OPPORTUNITIES ACROSS OUR VALUE CHAIN

	UPSTREAM	OWN OPERATIONS	DOWNSTREAM
ESRS E1 Climate change	<ul style="list-style-type: none"> ● Upstream GHG emissions and energy use (-) ● Physical climate risks (R) 	<ul style="list-style-type: none"> ● GHG emissions and energy use from own operations (-) ● Climate-related transition and physical risks (R) 	<ul style="list-style-type: none"> ● Downstream GHG emissions and energy use (-) ● Supporting customers in decarbonising efforts (O) ● Physical climate risks (R)
ESRS E5 Resource use and circular economy	<ul style="list-style-type: none"> ● Use of virgin materials (-) ● Supply risk of critical raw materials (R) 	<ul style="list-style-type: none"> ● Application of circular business models (O) 	<ul style="list-style-type: none"> ● Waste generation from sold products (-)
ESRS S1 Own workforce		<ul style="list-style-type: none"> ● Working conditions (+, O, R) ● Equal treatment and opportunities (+, O, R) 	
ESRS S2 Workers in the value chain	<ul style="list-style-type: none"> ● Working conditions (-, R) ● Other work-related rights (-, R) 		
ESRS S4 Consumers and end-users			<ul style="list-style-type: none"> ● Increased safety on land, at sea, and in the air (+)
ESRS G1 Business conduct		<ul style="list-style-type: none"> ● Strong corporate culture (O) ● Corruption risk (R) ● Cybersecurity risk (R) 	

The table above shows the identified impacts (I), risks (R) and opportunities (O) along with their respective locations in the value chain, denoted as follows: **(R)** Risk **(O)** Opportunity **(+)** Positive **(-)** Negative

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Environmental information

ESRS E1 Climate change

Climate change remains highly material to our business, and decarbonisation is a core part of our sustainability strategy. Our operations contribute to greenhouse gas emissions across the value chain, and we recognise both the risks and opportunities associated with the transition to a low-carbon economy. In 2025, we strengthened our climate work by gathering and mapping data for all material Scope 3 categories, giving us a more complete understanding of our value-chain emissions and enabling more targeted actions going forward.

IMPACTS, RISKS AND OPPORTUNITIES

In 2024, we conducted our first climate risk review as part of our double materiality process. We gained a clearer understanding of how our business activities generate GHG emissions and energy use across our operations, supply chain activities and sold products.

Physical climate risks can affect both our operations and locations, as well as upstream and downstream activities. These risks may lead to delays, limit access to supplies, and

damage sold products. Jotron also recognises a key opportunity to gain competitive advantage by supporting our customers in their decarbonisation efforts. This includes reducing the embedded emissions in sold products, improving the energy efficiency of products in use, and implementing other measures to support our customers' decarbonisation journey. Reducing the embedded emissions of sold products will require collaboration with our suppliers. If Jotron fails to meet future customer expectations



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IMPACT, RISK OR OPPORTUNITY		UPSTREAM	OWN OPERATIONS	DOWN-STREAM	SHORT TERM	MEDIUM TERM	LONG TERM
Climate change mitigation							
Actual negative impact	GHG emissions from own operations and the value chain	✓	✓	✓	✓	✓	✓
Risk	Inability to meet future customer requirements regarding climate action		✓	✓	✓	✓	
Opportunity	Achieving competitive advantage by offering products with lower carbon footprint than our competitors and supporting our customers in their decarbonisation efforts		✓	✓	✓	✓	✓
Climate change adaption							
Risk	Physical climate risk causing delays and damages in own operations and the value chain	✓	✓	✓	✓	✓	✓
Energy use							
Actual negative impact	Energy use in upstream manufacturing, own operations and during use of sold products	✓	✓	✓	✓	✓	✓
Opportunity	Increased energy efficiency of sold products			✓	✓	✓	✓

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on climate action, it could have a significant financial effect. However, Jotron is committed to driving decarbonisation efforts to ensure long-term business success.

POLICIES, ACTIONS AND TARGETS

Jotron's environmental management system is certified in accordance with ISO 14001, enabling us to manage environmental impacts, risks and opportunities effectively, including those related to climate change. We set annual targets and adhere to governing documents that include Environmental Policy, Ethical Guidelines for employees and Supplier Code of Conduct. In 2025, Jotron made additional steps to align with the decarbonisation ambitions determined by our double materiality assessment and resulting strategy.

The parent company, Jotron AS, has committed to a science-based climate target approved by the Science Based Targets Initiative (SBTi). This target aims to reduce absolute Scope 1 and 2 non-traded GHG emissions by 50 per cent from a 2018 baseline by 2030. Since 2018, Jotron AS has reduced its GHG emissions by 37 per cent,

putting the company well on track to achieve the emission reduction target.

To ensure that the group collectively strives towards reduced emissions, Jotron will set group-wide targets for Scope 1, 2 and 3 GHG emissions in 2026. The group is committed to reaching net zero GHG emissions by 2050, at the latest, in line with the Paris agreement. We acknowledge that achieving this goal requires group-wide actions and targets.

The most significant action taken so far has focused on Scope 2 GHG emissions by switching to renewable energy, primarily through the installation of solar panels. This action has been the main driver behind the emission reduction achieved by the parent company. Solar panels have been installed at both the head office and the sales office in UK, in line with our strategy to transition to renewable energy. Additionally, we have obtained energy attribute certificates for 96% of the electricity purchased, ensuring it comes from renewable sources. Our emission reduction plan also involves replacing fossil fuel cars with electric cars. By 2025, Jotron had a fleet of eight company cars,



consisting of three electric vehicles (38 per cent), four fossil-fuel vehicles (50 per cent), and one hybrid vehicle (12 per cent).

The head office's rented premises has achieved the BREEAM In-Use Very Good certification. All 50 electric vehicle chargers are powered by solar energy. Offering EV chargers to the head office's more than 200 employees encourage them to choose electric vehicles when more environmentally friendly commuting options are not feasible.

In 2025, we strengthened our climate work by gathering and mapping data for all material Scope 3 categories across the value

chain. This provides a more complete basis for identifying emission drivers and prioritising reduction measures in upstream and downstream activities. As part of this effort, we also updated our Supplier Code of Conduct to emphasise sustainable practices. These updates support our long-term ambition to reduce value-chain emissions and ensure that suppliers aligned with our sustainability priorities are prioritised in procurement processes.

TRANSITION PLAN

Jotron is currently working on establishing group-wide climate targets, and a transition plan is scheduled for development in 2027.



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ENERGY USE

Our energy use includes self-generated solar energy, purchased electricity, and natural gas. In 2025, Jotron's electricity consumption was 2 258.6 MWh, with 97% sourced from renewable energy. This compares to 2024, where consumption was 1 912.7 MWh, with 96% from renewable sources. All self-generated

non-fuel renewable energy comes from solar panels, accounting for 12% of the group's total energy consumption. No renewable energy is sourced from biomass, biofuels, biogas or hydrogen. Energy attribute certificates ensured that 96% of purchased electricity was renewable. All claimed renewable energy use is supported by documentation.

ENERGY CONSUMPTION AND MIX

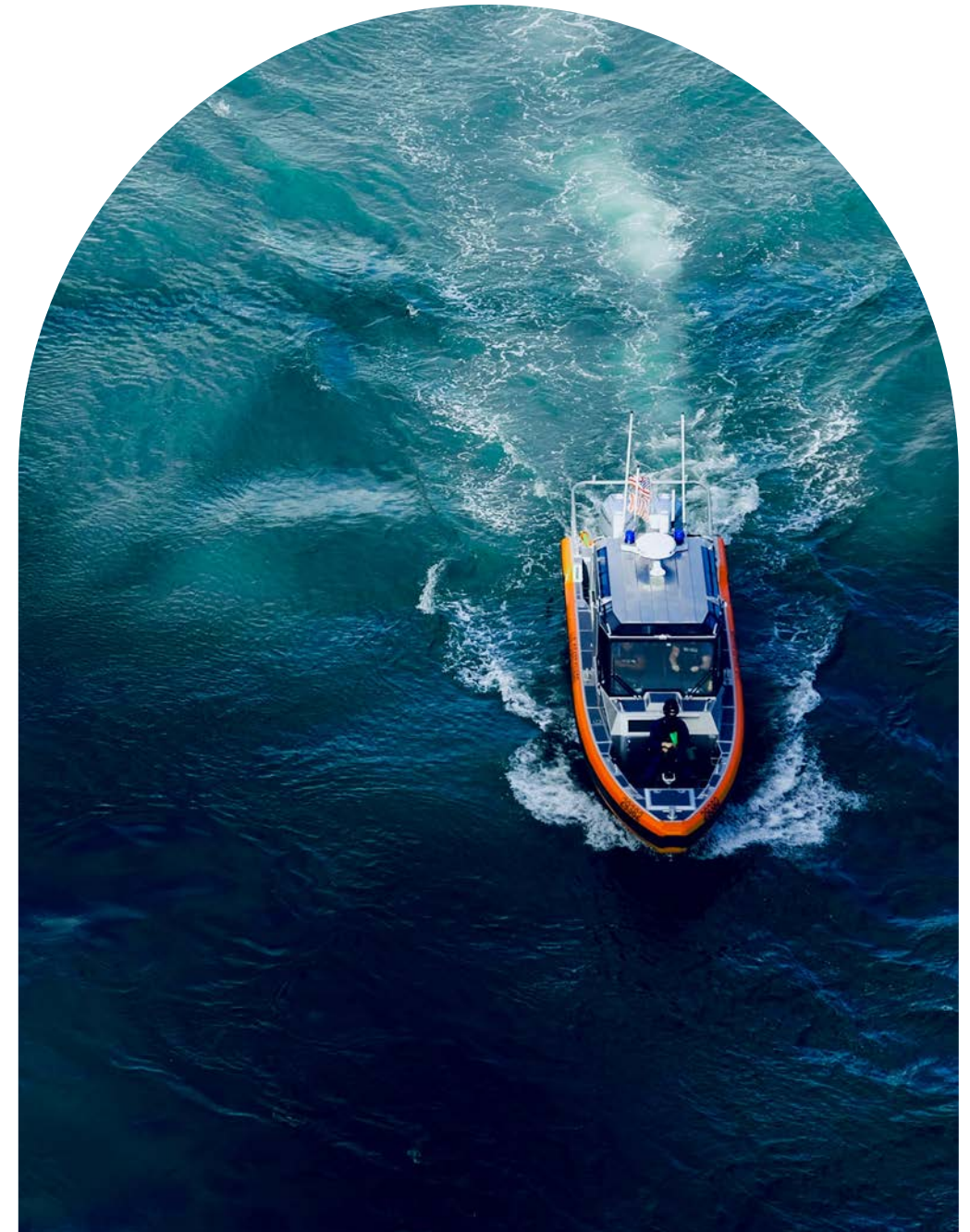
(MWh)	2025	2024	Per cent change
Non-renewable sources			
Natural gas	36.6	41.1	-10.9%
Acquired electricity from non-renewable sources	40.7	37.0	10.0%
Non-renewable sources total	77.3	78.1	-1.0%
Renewable sources			
Acquired electricity from renewable sources	1 911.1	1 632.9	17.0%
Self-generated non-fuel renewable energy	270.2	201.7	33.9%
Renewable sources total	2 181.3	1 834.6	18.9%
Energy consumption total	2 258.6	1 912.7	18.1%

ENERGY INTENSITY

Energy intensity is based on net revenues. In 2025, the energy intensity was 2.1 compared to 2.2 in 2024. The net revenues used to

calculate GHG intensity is 1 078 (AD Navigation revenue excluded) million NOK for 2025 and 883 million NOK for 2024.

(MWh/Million NOK)	2025	2024	Per cent change
Energy intensity	2.1	2.2	-4.5%



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GREENHOUSE GAS (GHG) EMISSIONS

The carbon footprint accounts encompass Scope 1, 2 and 3 GHG emissions under the operational control approach. Jotron's Scope 3 screening process has identified 12 material emission categories within Scope 3. The 2025 report includes Scope 3 emissions

for all the material categories with recorded emissions. Jotron does not currently rely on carbon credits, internal carbon pricing schemes, or other offsetting instruments.

The GHG emissions have the following distribution:

GHG EMISSIONS DISTRIBUTION

SCOPE 1	SCOPE 2	SCOPE 3
Direct GHG emissions from sources owned by Jotron	GHG emissions from Jotron's purchased electricity (location-based)	GHG emissions occurring in Jotron's value chain
13.5 tCO₂e	135.7 tCO₂e	24 260.3 tCO₂e
0.05% of total	0.55% of total	99.4% of total

The carbon accounts resulted in a total of 24 409.5 tCO₂e. Emissions in Scope 1 stem from mobile combustion from use of company cars and stationary combustion of natural gas to heat one office. In Scope 2, emissions stem from electricity consumption in buildings and electric vehicles. The parent company, Jotron AS, account for 7 per cent of total Scope 1

and 2 emissions. Our Lithuanian production entity, Jotron UAB, account for the largest share of emissions in Scope 1 and 2, with a 50 per cent share. More than 99 per cent of group-wide emissions come from Scope 3, with purchased goods and services and use of sold products accounting for 80 per cent of the total Scope 3 emissions.

SCOPE 1 AND 2 EMISSIONS (in tCO ₂ e)	2025	Per cent of total
Jotron UAB	74.0	50%
Jotron USA	24.4	16%
Jotron ASIA	15.0	10%
Jotron UK	13.6	9%
Jotron MEP	10.2	7%
Jotron AS	10.0	7%
Jotron SKIPPER	2.1	1%



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GHG EMISSIONS

(tCO ₂ e)	2025	2024	Per cent change
Gross Scope 1 GHG emissions	13.5	14.3	-5.6%
Gross Scope 2 GHG emissions (location-based)	135.7	99.7	36.1%
Gross Scope 2 GHG emissions (market-based)	28.7	16.7	71.9%
Gross Scope 3 GHG emissions	24 260.3	19 134.8	26.8%
Purchased goods and services	10 984.2	9 530.6	15.3%
Capital goods	841.5	535.5	57.1%
Fuel-and-energy-related activities	40.1	31.6	26.9%
Upstream transportation and distribution	1 230.1	1 121.3	9.7%
Waste generated in operations	76.0	58.6	29.7%
Business travel	743.6	878.4	-15.3%
Employee commuting	183.1	238.2	-23.1%
Upstream leased assets	18.4	121.6	-84.9%
Downstream transportation and distribution	453.7	343.8	32.0%
Use of sold products	9629.5	6234.3	54.5%
End-of-life treatment of sold products	60.2	40.8	47.5%
Total GHG emissions (location-based)	24 409.5	19 248.8	26.8%

Jotron has consolidated group-wide Scope 1 and Scope 2 greenhouse gas (GHG) emissions from 2023 onward. As this was the first year with complete and consistent data coverage, 2023 has been established as the group's base year for Scope 1 and 2. In the same year, Jotron acquired a company that introduced our maritime navigation segment, further supporting 2023 as an appropriate base year.

In 2025, Jotron acquired a second company that added our voice communication segment. This acquisition increased total emissions by 2 797 tCO₂e and resulted in a significant rise in emissions from use of sold products (54.5 percent). Because this structural change materially altered our Scope 3 boundary, 2025 has been established as the new base year for Scope 3 emissions.

Due to methodology changes and the implementation of a new carbon accounting software, 2024 emissions for all categories differ slightly from the figures reported last year. However, these changes remain below the threshold for material impact and therefore do not trigger a recalculation of the base year for Scope 1 and 2.

Jotron aims to calculate emissions using primary data, which is collected directly from company-specific activities, rather than relying on estimations or secondary sources. When primary data is difficult to obtain, secondary data from recognised sources are used. In 2025, 87 per cent of emissions are calculated using activity-based data, while 13 per cent is calculated using spend-based data. For the 87 percent of emissions calculated

using activity data, some categories did not provide full activity coverage. In these cases,

the missing share was extrapolated based on the proportion of available activity data.



GHG INTENSITY

GHG intensity is based on net revenues.

tCO ₂ e/MNOK	2025	2024
Gross Scope 1 and 2 GHG emissions (location-based)	0.14	0.13
Gross Scope 1 and 2 GHG emissions (market-based)	0.04	0.04
Total GHG emissions (location-based)*	22.6	21.8
Total GHG emissions (market-based)*	22.5	21.7

In 2025, the emission intensity for Scope 1 and 2 was 0.14 compared to 0.13 in 2024. Including the calculated Scope 3 categories, the emission intensity was 22.6 in 2025 compared to 21.8 in 2024. The net revenues used to calculate GHG intensity is 1 078 million NOK for 2025 (AD Navigation

revenue excluded) and 883 million NOK for 2024. Due to the addition of more Scope 3 categories and updated methodologies, emission intensity numbers for 2024 are different than the figures we reported in our previous sustainability statement.

Environmental information

ESRS E5 Resource use and circular economy

In contrast to the traditional linear economy, the circular economy seeks to keep products and resources in use as long as possible. The circularity approach maximises value at every stage of the lifecycle while reducing the pressure on nature. Given the electronics sector’s high resource intensity and the rapidly growing volume of e-waste, Jotron sees a substantial potential for improved circularity for our business. Therefore, circularity is a critical component of our sustainability and business strategy.



IMPACTS, RISKS AND OPPORTUNITIES

Jotron make use of virgin materials through our supply chain activities. The dependency on virgin materials increases the supply risk of critical raw materials and components, a risk known as linear risk, which supports a linear rather than a circular economy. Jotron has identified several opportunities to increase circularity and reduce dependence on natural resources by applying circular

practices and adopting circular business models. This approach will also mitigate the negative impact of waste generated from disposed products.

POLICIES, ACTIONS AND TARGETS

Jotron’s environmental management system is certified in accordance with ISO 14001, enabling us to manage environmental impacts, risks and opportunities effectively,

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	IMPACT, RISK OR OPPORTUNITY	UPSTREAM	OWN OPERATIONS	DOWN-STREAM	SHORT TERM	MEDIUM TERM	LONG TERM
Resource inflows, including resource use							
Actual negative impact	Use of virgin materials in the supply chain	✓			✓	✓	✓
Risk	Supply risk of critical materials and components	✓	✓		✓	✓	✓
Waste							
Potential negative impact	Waste generation from sold products directed to disposal by landfill			✓	✓	✓	✓
Resource inflows, outflows, and waste							
Opportunity	Design for: <ul style="list-style-type: none"> • long lifetime, supported by software updates • repair and spare parts replacement • reuse and remanufacturing • dismantling and recyclability 	✓	✓	✓	✓	✓	✓
Opportunity	Application of circular business models	✓	✓	✓		✓	✓

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including those related to resource use and circular economy. We set annual targets and adhere to governing documents that include Environmental Policy, Ethical Guidelines for employees and Supplier Code of Conduct. Going forward, Jotron will improve our policies and procedures to better align with our circularity ambitions determined by our double materiality assessment and resulting strategy.

Our main focus is to deliver high-quality products that are designed for durability, supported by software updates to extend product life. Minimising resource use and reducing reliance on virgin materials is critical for preserving natural resources, while also mitigating supply chain risk. Moreover, promoting reuse and enabling recycling are essential for adopting an approach aligned with circularity principles.

Jotron has defined objectives to reduce waste, promote reuse and enable recycling. We will also develop measurable targets to track our progress. Objectives to reduce waste generation include:

- Substitute virgin materials with secondary raw materials
- Investigate product resource efficiency measures
- Ensure that all software updates are available for all products where updates are required
- Collaborate with regulatory bodies to ensure that regulations support circularity

To promote reuse, Jotron has objectives through the product life cycle:

- Provide all necessary key parts for all products in our portfolio
- For the lifetime of every Jotron product, ensure publicly available information about non-destructive disassembly and repair
- Investigate pathways for adopting circular business models that promote reuse

To enable recycling, Jotron has objectives through the product life cycle:

- Increase the recyclability of products by substituting non-recyclable materials and ensure easy access to materials, including critical raw materials
- For the lifetime of every product, ensure publicly available information about steps from product dismantling and recycling, including content of critical raw materials
- Proactively substitute hazardous substances

Jotron is in the process of implementing circular principles in our gate model, ensuring that sustainable and circular factors are considered during the product development stage. The gate model is a structured development process that moves projects through defined stages with clear decision points. Additionally, we are in the testing phase of transitioning from non-recyclable plastic packaging to a recyclable cardboard packaging solution for our maritime products.



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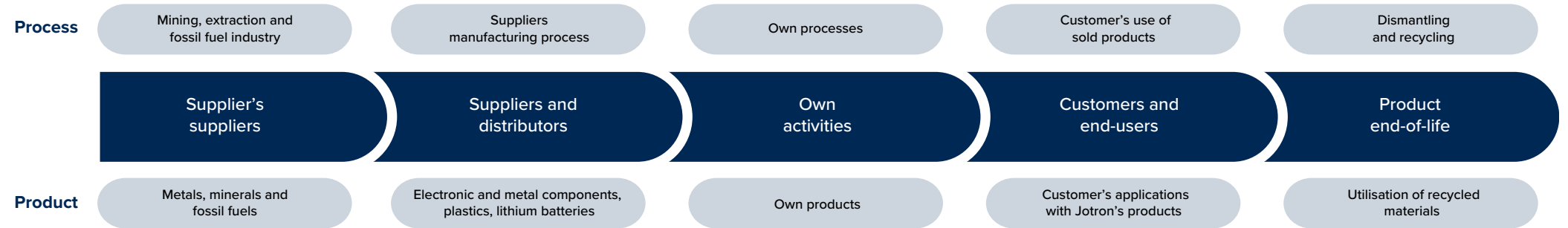
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RESOURCES INFLOWS AND OUTFLOWS

Resources that enter Jotron's facilities include electronic and metal components, plastics and lithium batteries. Some raw materials in our purchased products are classified as critical according to the EU's 2023 fifth list of critical raw materials. The purchased products are input factors to our own production of radios, recorders, maritime communication and navigation products. Our sold products, resource outflows, are distributed to customers globally. To contribute to proper handling of the product's end-of-life, Jotron provides dismantling and recycling information on our website for all radio, recorder and maritime communication products. Dismantling and recycling information about our maritime navigation products is anticipated to be published in 2026. Together with dismantling and recycling information, Jotron provides a list of critical raw materials that might be present in our different commodity groups.

Our own processes include 1) Marketing and sales, 2) Development, 3) Procurement,

4) Warehousing, 5) Production, 6) Order and delivery, 7) After sales and support, supported by project management in almost every step. The development process is particularly crucial for achieving our circular objectives. With circular design, products are created to minimise waste and maximise resource efficiency, which involves designing for durability, reparability, and recyclability.

WASTE FROM OWN OPERATIONS

Although Jotron considers our impact on waste generation as most significant in our downstream value chain, we have gathered data on waste from our own operations. The data is derived from information provided by waste management companies and our own assumptions, based on publicly available information.

Jotron's waste streams largely consist of recyclable materials such as cardboard and paper, metals, mixed plastics, and packaging glass. Electronic waste (WEEE) from equipment manufacturing and maintenance is handled through certified recycling partners, with only small fractions sent to landfill.

WASTE FROM OWN OPERATIONS (KG)	2025
Total waste generated (kg)	109 457
Hazardous waste diverted from disposal (kg)	307
Hazardous waste diverted from disposal due to recycling (kg)	113
Hazardous waste diverted from disposal due to other recovery operations (kg)	194
Non-hazardous waste diverted from disposal (kg)	84 551
Non-hazardous waste diverted from disposal due to recycling (kg)	25 092
Non-hazardous waste diverted from disposal due to other recovery operations (kg)	59 369
Non-hazardous waste directed to disposal (kg)	24 082
Non-hazardous waste directed to disposal by incineration (kg)	NA
Non-hazardous waste directed to disposal by landfilling (kg)	24 082
Non-recycled waste (kg)	24 689
Non-recycled waste (%)	22.5%
Total amount of hazardous waste (kg)	914

Social information

ESRS S1 Own workforce

Social sustainability is about ensuring that the organisation focuses not only on economic and environmental goals but also on the well-being and rights of employees, people in our value chain, and the broader community. This includes promoting fair labour practices, fostering diversity and inclusion, and ensuring that the organisation's operations and policies contribute positively to social equity and justice.

At Jotron, we are focused on creating a fair, inclusive, and safe workplace for our employees. This includes a strong commitment to protecting rights, promoting diversity and inclusion, and ensuring that our employees have access to the necessary resources to thrive and develop. We emphasise the importance of a good working environment, employee well-being, and a system for addressing and preventing any challenges that may arise. It is about building a culture where employees feel valued, and their voices are heard in decision-making processes that affect their working conditions.

IMPACTS, RISKS AND OPPORTUNITIES
 Jotron is dedicated to positively impacting the working environment by empowering employees, promoting a healthy work-life balance, and fostering diversity and inclusion. We recognise the benefits of increased diversity and improved internal collaboration. Greater diversity can boost employee satisfaction, attract talent, and drive innovation, while improved collaboration enhances engagement, learning, and efficiency. By embracing these opportunities, we pave the way to long-term business success and cultivate a positive



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IMPACT, RISK OR OPPORTUNITY		UPSTREAM	OWN OPERATIONS	DOWN-STREAM	SHORT TERM	MEDIUM TERM	LONG TERM
Working conditions							
Actual positive impact	A positive and secure workplace focused on employee empowerment and a healthy work-life balance		✓		✓	✓	✓
Opportunity	Increased internal collaboration that improves employee engagement, learning and efficiency		✓		✓	✓	✓
Risk	Risk of not being able to recruit and keep the necessary competencies		✓			✓	✓
Equal treatment and opportunities for all							
Actual positive impact	An inclusive workplace focused on equality and development opportunities		✓		✓	✓	✓
Opportunity	Increased diversity and inclusion that improves employee satisfaction, attracts talents, and drives innovation		✓		✓	✓	✓

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and inclusive working environment for our employees. As an attractive employer, Jotron successfully recruits the necessary talent. However, we face a medium- to long-term risk of not being able to maintain this success due to potential future changes in market conditions.

POLICIES, ACTIONS AND TARGETS

Our strategy plan reinforces Jotron's commitment to its people by embedding diversity, inclusion and equal opportunities into the way we work. The plan highlights our identity as supportive team players and committed employees, and sets clear expectations for maintaining an attractive, fair and safe workplace. These priorities strengthen our ability to develop competencies, ensure transparent and responsible people practices, and foster a culture built on trust, openness and continuous improvements supporting the long-term well-being and growth of all employees.

Our approach is supported by group-wide ethical guidelines that outline expected behavior, responsible decision-making and standards for a safe and respectful working environment. Local health and safety practices and procedures complement these guidelines and are adapted to regulatory requirements in each country where Jotron operates.

EMPLOYEE ENGAGEMENT AND DIALOGUE

Jotron has local workforce arrangements in place across its locations to support constructive cooperation between employees and management. These frameworks outline expectations for dialogue, involvement, and workplace practices, and ensure that working conditions are managed in a consistent and responsible

way within each country's regulatory context. Together, they contribute to a predictable, fair and supportive work environment for all employees.

Jotron measures employee engagement through a groupwide employee survey conducted across all locations. The latest survey achieved a response rate of more than 80%, providing a robust basis for understanding involvement, communication and workplace experience across the organisation. These insights, together with feedback gathered through local dialogue processes, guide improvement actions and help strengthen a fair, supportive and engaging work environment.

In addition to our groupwide engagement survey, Jotron has previously conducted a dedicated Equality and Inclusion Survey in 2024 in Jotron Norway. This survey will be expanded to cover the entire Jotron Group in 2026. Jotron also facilitates dialogue initiatives involving culturally diverse employees, creating a safe space to discuss workplace culture, adaptation and cultural perspectives. This work has already led to concrete actions, such as organising an International Week to strengthen cultural awareness and belonging.

ADDRESSING AND REPORTING WORKPLACE CONCERNS

If feedback, survey results or other reporting channels indicate that Jotron has caused or contributed to a negative impact on employees, we address it through a structured process that includes early dialogue, assessment of the situation, appropriate corrective measures and follow-up to prevent recurrence. Actions may involve adjustments to work conditions, targeted support for the



individuals affected, management follow-up, or broader improvements in the work environment. Insights from these cases help guide improvements and reduce the chance of similar issues arising in the future.

Jotron strives to maintain an open and trusting workplace culture where concerns can be raised directly and without fear of negative consequences. Employees are encouraged to report issues or unwanted situations to their manager, the local safety representative or HR, depending on what feels most appropriate. Reports are handled confidentially and with respect for all parties involved. Jotron does not tolerate retaliation against anyone who raises a concern in good faith and follow-up processes are designed

to protect the individual while ensuring that the matter is assessed and addressed appropriately. For external stakeholders, Jotron provides a separate Speak Up Channel for reporting serious concerns.

Health and safety

Creating and maintaining a safe and healthy work environment is a top priority at Jotron. We prioritise protection and prevention to avoid illness, injury, and potential incidents. Ensuring health and safety are shared responsibilities between employer and employee requires ongoing collaboration and cooperation from all parties involved. We systematically work to prevent physical and psychosocial work-related strain, aiming to foster a positive work environment where

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well-being and engagement are prioritised. This is achieved through risk assessments, clear responsibilities, thorough training, and the safe use of equipment. Additionally, we continuously improve workplace safety by registering and analysing incidents to learn from unwanted situations.

To strengthen our work in health and safety, we are focusing on the following actions:

- **Preventive actions**

We continuously work to identify and mitigate risks through risk assessments and safety initiatives.

- **Employee engagement and collaboration with safety representatives**

All employees are encouraged to take an active role in maintaining safety and reporting potential hazards. We work closely with safety representatives to ensure that safety policies and procedures are effective and continuously improved.

- **Continuous improvement and training**

We remain committed to maintaining a low accident rate and further strengthening our safety culture through training, awareness, and continuous improvements in health and safety management.

The parent company, Jotron AS, has a health and safety management system certified to ISO 45001 standards.

ACCOMMODATION AND ACCESSIBILITY

Jotron is committed to providing an inclusive and supportive work environment where employees with temporary or long-term physical or psychological limitations can

continue to contribute and develop. Our policies emphasise early dialogue, individual accommodation, and collaboration between the employee, manager and relevant support functions. Adjustments may include modified tasks, adapted workstations, flexible work arrangements or access to suitable tools and equipment. We aim to remove barriers that limit participation, promote well-being and create conditions for all employees to perform their work in a safe and respectful environment.

DIVERSITY AND INCLUSION

At Jotron, we are committed to fostering a diverse and inclusive workplace. To strengthen our efforts in this area and create a workplace where diversity thrives, we have implemented actions in our key focus areas:

- **Gender balance at all levels**

We aim to improve gender balance within the organisation, particularly in technical positions, as these roles show a clear underrepresentation of women.

Our recruitment processes emphasise gender-neutral job advertisements, and we highlight female role models in engineering and development roles. Through partnerships with schools and universities, we inspire more young people to choose technology careers.

- **Diverse recruitment**

We strive to attract candidates from diverse backgrounds. In all recruitment processes, at least one qualified candidate from an underrepresented group will be invited for an interview. To support integration, we offer e.g. language courses and have established a diversity & culture committee.



- **Competence development in diversity management**

We enhance leadership capabilities at all levels to support diversity and inclusion. This includes training on how to effectively manage language barriers, professional differences, and cultural diversity. Diversity is placed on the agenda in leadership meetings. We have delivered dedicated training sessions for leaders, union representatives, and safety

representatives, covering topics such as cultural intelligence, unconscious bias, inclusive leadership, and best practices for diversity in recruitment and workplace culture.

Through these actions, Jotron actively works to be a workplace where all employees feel valued, safe, and supported. Jotron will continue to develop a clear strategy for diversity and inclusion in the company.

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EMPLOYMENT BY LOCATION 2025

COUNTRY	Number of employees (head count)
Norway	255
Lithuania	119
UK	14
US	7
Singapore	9
Netherlands	14
Total	418

EMPLOYMENT BY CONTRACT TYPE 2025

JOTRON GROUP	Female	Male	Total
Permanent	146	250	396
Temporary	4	13	17
Full time	142	251	393
Part time	6	8	14

At Jotron, we value long-term career opportunities and continuous training and development. Consequently, we focus on permanent and full-time employment contracts, resulting

in a low proportion of temporary and part-time employees. The part-time employees have either chosen this themselves or are students working as part of their studies.

GENDER BALANCE 2025

	Female 2024	Male 2024	Female 2025	Male 2025	Total 2025
Board of directors	4 (57%)	3 (43%)	4 (50%)	4 (50%)	8
Top management	7 (41%)	10 (59%)	7 (35%)	13 (65%)	20
Total company	136 (37%)	227 (63%)	150 (36%)	268 (64%)	418

UAB JOTRON	Female	Male	Total
Total	72	47	119

JOTRON AS	Female	Male	Total
Total	58	149	207

Industries such as technology, data, and electronics typically have a higher proportion of men, particularly in engineering and technical roles. This pattern is evident at Jotron as well. The gender balance is better at the

board and management levels. Representation at decision-making level can facilitate efforts to enhance overall gender distribution within the company.



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AGE DISTRIBUTION 2025

	Under 30	30-50	Over 50
Total company	11,9%	44,3%	43,8%

The age distribution shows that Jotron has a balanced and experienced workforce. Midcareer employees remain the largest group, while employees over 50 also make up a substantial share of the organisation. Younger employees under 30 account for a smaller proportion, indicating continued opportunities for generational renewal and future recruitment.

PAY EQUALITY AND COMPENSATION

At Jotron, all employees shall be properly compensated for the work they perform, regardless of gender or other diversity factors, and are paid an adequate wage in line with applicable benchmarks. Essential for evaluating the job level is the job description. Jotron is publishing annual statements on equality and non-discrimination in accordance with the Norwegian Equality and Anti-Discrimination Act, where pay equality and compensation ratios for the Norwegian parent company is presented. The statements are available on our website.

TRAINING AND SKILLS DEVELOPMENT

At Jotron, we believe in continuous learning and development. All employees have annual conversations with their managers about goals, performance, and career growth to ensure they have the support they need to develop in their roles. Through both formal and informal learning opportunities, we make sure our employees have the tools and knowledge they need to grow and succeed.

We offer a wide range of internal training opportunities, including e-learning, knowledge-sharing sessions, and structured external courses. Some employees also take external courses, and a few even pursue further education alongside their job. Since most of our employees are engineers, staying up to date with industry developments and technical skills is not only a natural part of our work, but an essential requirement for maintaining quality and innovation.

NON-DISCRIMINATION

There were zero detected incidents of discrimination in 2025.

We have had no reported incidents of discrimination, which we believe reflects our strong company culture built on openness, collaboration, and mutual respect. At Jotron, we work closely with employee representatives and safety representatives to ensure a healthy and fair working environment. Employees are encouraged to raise concerns at an early stage, whether related to conflicts, unfair treatment, or other workplace issues. Our focus is on addressing concerns proactively at the lowest possible level to maintain a positive and supportive work culture.

Jotron monitors compliance with labour regulations and workplace requirements across all locations. During the reporting



period, Jotron incurred no fines, penalties or compensation related to workforce matters.

HEALTH AND SAFETY

Our approach to health and safety is based on preventive measures, continuous improvement, and a strong safety culture where employees are encouraged to report concerns and take an active role in maintaining a safe working environment. Our health and safety metrics show that there were:

- Zero fatalities among our own workforce and other workers operating on our sites
- Three recordable work-related accidents, resulting in a 1.21 per cent accident rate per one million hours worked
- Zero recorded cases of work-related ill health among employees
- A total of 92 workdays lost due to work-related injuries

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HEALTH AND SAFETY METRICS

	2025	2024
Number of fatalities in own workforce as result of work-related injuries and work-related ill health	0	0
Number of fatalities as result of work-related injuries and work-related ill health of other workers working on undertaking's sites	0	0
Number of recordable work-related accidents for own workforce	1	3
Rate of recordable work-related accidents for own workforce per one million hours worked	1.21%	1.01%
Number of cases of recordable work-related ill health of employees	0	0
Number of days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health related to employees	92	18
Sick leave (based on 327 employees)	4.26%	4.67%

ACTION PLANS AND RESOURCES

Jotron works systematically to prevent negative impacts on employees and to strengthen inclusion, well-being and equal opportunities across the group. Our ongoing action plans include initiatives such as regular engagement surveys, targeted follow-up on identified improvement areas, diversity and inclusion assessments, and dialogue activities that support cultural understanding and belonging. Local HR and management teams allocate the necessary resources to implement these measures, and progress is monitored through established follow-up processes. When concerns arise, Jotron takes appropriate corrective actions to address the situation and to reduce the risk of similar issues in the future.

EMPLOYEE WELL-BEING, EFFECTIVENESS AND RESOURCES

Jotron invests in employee well-being through dedicated HR resources, with plans to expand the team further, as well as through continuous leadership development and training related to workplace environ-

ment, employee dialogue and follow-up of engagement surveys. Leaders participate in development programmes, and safety representatives receive training to support their role. We also run programmes and activities aimed at strengthening workplace culture and inclusion, and we engage external consultants when needed – either to support the work environment or to develop leaders and employees in demanding situations.

The effect of these initiatives is monitored through groupwide engagement surveys, inclusion assessments and structured follow-up processes. Insights from these sources guide targeted improvements and help us address risks and reduce the likelihood of negative impacts on employees.

PERFORMANCE TRACKING AND LEARNING

Jotron involves employees actively in tracking progress and identifying improvement areas. Units or departments work together to set goals based on the results of the engagement survey, and employees



follow up previous results and actions together with their manager throughout the year. Teams also develop plans for how their work will align with Jotron's overall strategy, ensuring that improvement efforts are integrated into daily operations.

Employee representatives participate in relevant dialogue forums where they can provide input on measurements, proposed changes and other workforce related topics before decisions are made. Insights from surveys, team discussions and past performance are used to identify lessons learned and guide adjustments to workplace practices, leadership development and cultural initiatives across the group.

DATA COMPILATION METHODS

Workforce data included in this report is

compiled through a combination of local HR and payroll systems across all Jotron locations. Information on headcount, employment type, absenteeism and workforce movements is provided by each entity and consolidated by group HR. Health and safety data is sourced from incident and reporting systems in each location, while engagement results are collected through groupwide surveys with high response rates.

Where exact data is not available, Jotron applies standardised assumptions, such as country specific fulltime equivalent (FTE) norms to calculate total hours worked. All indicators follow definitions aligned with ESRS S1 where applicable. Data quality is ensured through internal validation by HR and crosschecks with financial and operational reporting.

Social information

ESRS S2 Workers in the value chain

Jotron sourced products and services to core business activities from 331 suppliers exceeding NOK 100 000 per supplier in 2025. Most products and services, in terms of purchase costs, were sourced from suppliers in Europe (88.20 per cent). The Nordics make up 55.29 per cent of the European purchases.

IMPACTS, RISKS AND OPPORTUNITIES

Jotron has identified risks for breaches of human and labour rights, especially in upstream manufacturing and mining in high-risk countries. If purchased products contain conflict minerals, there is a risk of severe human rights breaches, such as child and forced labour. To the degree that workers in the supply chain are subject to bad working conditions or severe human rights breaches, Jotron has a potential indirect negative impact.

POLICIES, ACTIONS AND TARGETS

Supplier Code of Conduct

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.



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IMPACT, RISK OR OPPORTUNITY		UPSTREAM	OWN OPERATIONS	DOWN-STREAM	SHORT TERM	MEDIUM TERM	LONG TERM
Working conditions							
Potential negative impact	Use of virgin materials in the supply chain.	✓			✓	✓	✓
Risk	Risk for breaches of human and labor rights related to working conditions in upstream manufacturing and mining in high-risk countries.	✓			✓	✓	✓
Other work-related rights							
Potential negative impact	To the extent supply chain workers are subject to severe human rights breaches, it can lead to negative impacts.	✓			✓	✓	✓
Risk	Risk that purchased products contain conflict minerals from conflict zones, which is associated with severe human rights abuses as child labor and forced labor.	✓			✓	✓	✓

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Supplier qualification

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.

Supply chain due diligence

We conduct human rights due diligence to identify adverse impacts in the supply chain. To identify potential adverse impacts, we conduct overall risk assessments for suppliers with purchasing costs of at least NOK 100 000 in the relevant fiscal year. These risk assessments are based on the supplier's home country and utilise internationally recognised indexes that measure risk levels related to human rights, labor rights and corruption. The indexes are updated annually.

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. The due diligence questionnaire focuses on the following topics related to 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.

The initial supplier risk screening conducted for 2025 identified 26 suppliers with headquarters and/or operations in countries assessed as having medium or higher risk according to one or more of the applied risk indexes.

Suppliers classified as high risk are required to complete the supplier due diligence questionnaire annually, regardless of whether they have responded in previous years. Suppliers categorised as medium risk are assessed biannually. Should findings or concerns be identified in a supplier's response within the medium-risk category, the supplier is reclassified as high risk and included in the annual follow-up cycle. This risk-based approach ensures that mitigation measures, dialogue, and follow-up activities

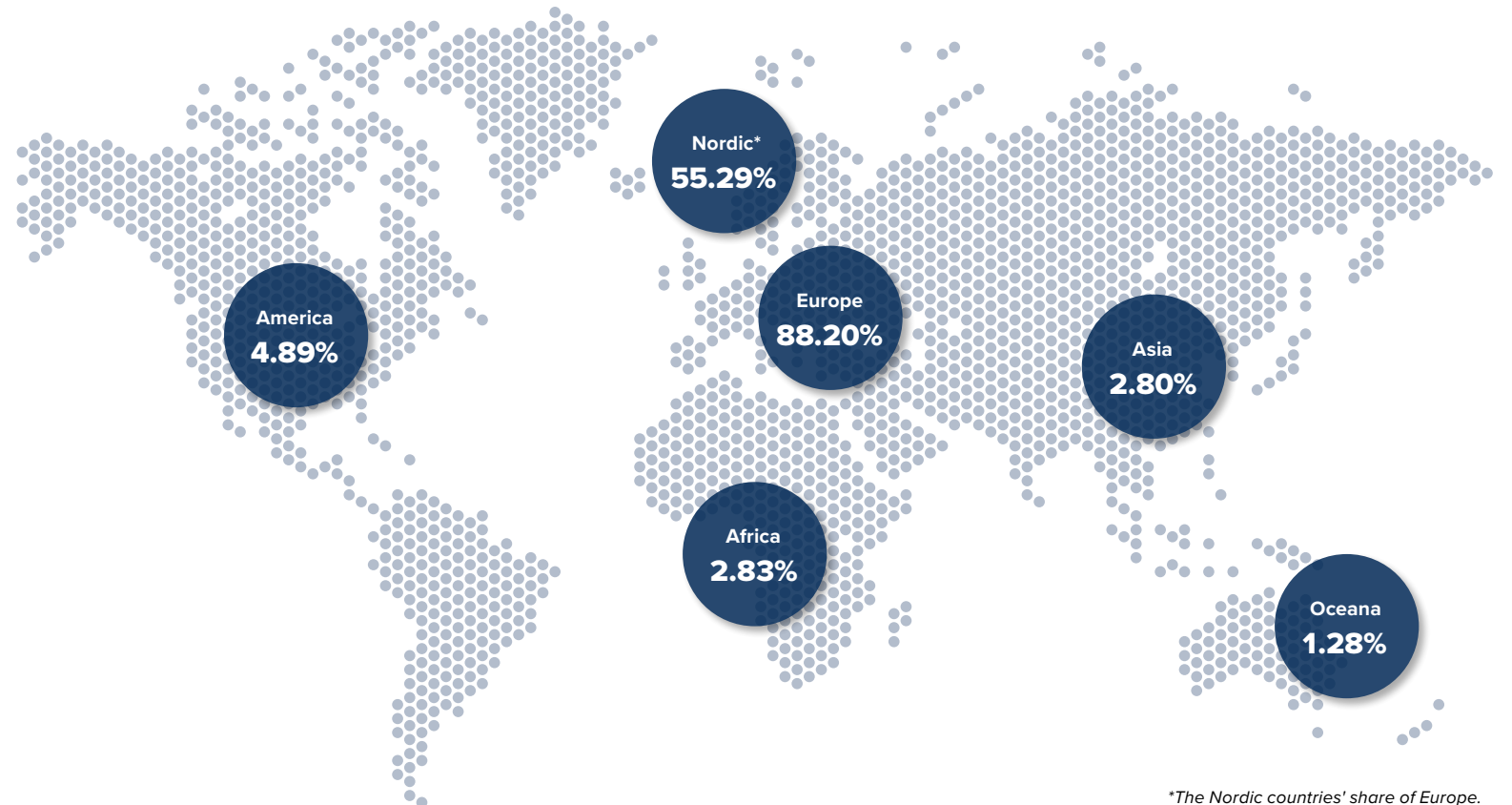
are implemented promptly and prioritised where the potential ESG risks are greatest. Of the 26 suppliers identified as medium or higher risk in 2025, 14 suppliers completed the questionnaire, resulting in a response rate of 54 per cent.

Jotron has implemented SiliconExpert as a central tool to strengthen supply chain transparency, risk management, and traceability in line with the OECD Guidelines for Multi-national Enterprises. The solution provides

continuously updated insights into component material content, origin, and regulatory requirements, supporting systematic identification and monitoring of supply chain risks. This enhances Jotron's due diligence processes and contributes to responsible sourcing and robust supply chain governance.

The findings from the due diligence procedures have not uncovered actual adverse impacts on human or labour rights but have identified risks of adverse impacts. Jotron

GEOGRAPHICAL LOCATION OF JOTRON'S SUPPLIERS



*The Nordic countries' share of Europe.

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is working with the findings by prioritising the highest risks first. To improve and streamline our human rights due diligence procedures, we have implemented software supporting us with this. Additionally, we have introduced the Speak Up Channel on our website, enabling external stakeholders to raise concerns in a secure manner. This channel allows anyone in our value chain to securely report serious concerns, including human rights issues, safety risks, information security breaches or product vulnerabilities. Reports can be submitted anonymously, and all cases are handled confidentially through a structured four-step investigation process.

Jotron is publishing annual transparency statements on human rights due diligence in accordance with the Norwegian Transparency Act, where our due diligence procedures are described more in detail. The statements are available on our website.

Engagement with value chain workers

Jotron engages with value chain workers through supplier due diligence processes and accessible grievance mechanisms. Perspectives related to working conditions and work-related rights are gathered via supplier due diligence questionnaires covering topics such as wages and working hours, health and safety, freedom of association, and grievance mechanisms. This effort is supplemented by the Speak Up Channel, which is available to external stakeholders, including value chain workers, for secure and anonymous reporting. Findings from these processes are reviewed by the sustainability function and procurement representatives and reported to the corporate management team, informing supplier risk classification,

prioritisation of follow-up activities, and decisions on mitigation measures and dialogue with suppliers, particularly for those assessed as medium or high risk.

Taking action and remediation

When Jotron identifies risks or potential adverse impacts on value chain workers, these are addressed through dialogue with suppliers and clear communication of expectations. Suppliers may be required to implement improvement measures, provide documentation, or be subject to closer follow-up.

Jotron supports suppliers by sharing the Supplier Code of Conduct, providing guidance related to due diligence questionnaires, and maintaining ongoing dialogue to strengthen understanding of human rights and working conditions. Concerns raised through due diligence processes or the Speak Up Channel are handled in line with internal procedures, with actions prioritized based on severity and risk. The effectiveness of measures is monitored through repeated risk assessments and, where relevant, supplier reclassification.

Feedback, lessons learned and targets

Feedback related to value chain workers, gathered through due diligence processes and the Speak Up Channel, is used to identify recurring risks and improve Jotron's supplier management. The insights support clearer expectations in the Supplier Code of Conduct, better prioritisation of supplier follow-up, and a more risk based and systematic approach, particularly for high-risk suppliers. The findings also inform priorities for future improvements and prevention of adverse impacts in the value chain.



Social information

ESRS S4 Consumers and end-users

Jotron delivers products that support critical communication and safety functions in aviation, maritime and offshore environments. Because our equipment is used in situations where reliability and clarity are essential, the safety of consumers and end-users is a core part of how we design, develop and support our products. This reflects our commitment to providing equipment that is safe, reliable and potentially lifesaving. Jotron’s customer commitment “Safe-Journey” relates both to the quality of our products and to the customer support during the entire lifetime of the equipment.

IMPACTS, RISKS AND OPPORTUNITIES

Jotron creates a positive impact on consumers and end-users through products that enhance the safety of critical operations on land, at sea and in the air. Our maritime safety equipment contributes directly to life-saving communication and location identification during emergencies. The maritime navigation products are essential tools for avoiding collisions and safe voyage. Our aviation communication and recording systems facilitate secure and reliable interaction between air traffic controllers and aircraft.

POLICIES, ACTIONS AND TARGETS

Jotron’s Ethical Guidelines outline expectations for responsible conduct, respect for human rights and maintaining a safe operating environment for all stakeholders, including consumers and end-users. Product safety and reliability are central principles, supported by compliance with GDPR, IMO, ICAO, Safety of Life at Sea (SOLAS) and relevant aviation standards. Jotron ensures that products are intuitive and safe to operate, especially in emergency situations.

Safety is embedded early in product development. The first step in Jotron’s gate model



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	IMPACT, RISK OR OPPORTUNITY	UPSTREAM	OWN OPERATIONS	DOWN-STREAM	SHORT TERM	MEDIUM TERM	LONG TERM
Personal safety of consumers and/or end-users							
Actual positive impact	Providing products that increases safety on land, at sea and in the air			✓	✓	✓	✓

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requires an assessment of customer requirements and end-user perspectives. This ensures that safety and ease of use are evaluated from the outset. Jotron also contributes to industry standard-setting through participation in international standardisation forums and focus groups.

Consumer engagement

Jotron places significant emphasis on training end-users. For ATC products, Jotron provides in-person training courses to ensure that operators understand how to use equipment safely and effectively. This includes training in communication systems, recording tools and monitoring solutions. These programs support safe and reliable operations by ensuring that users are fully educated.

During customer projects, Jotron maintains frequent communication with the customer and end-users. Feedback received during installation, configuration and operational phases is used to identify concerns or improvement areas. Such concerns are discussed in monthly management meetings, ensuring high-level visibility and making sure consumer perspectives are accounted for in decision-making.

Processes to remediate negative impacts

Jotron maintains structured remediation processes to address any potential negative impacts on consumers and end-users. Our approach is built around structured systems for identifying, reporting and addressing non-conformities. Jotron encourage all employees to submit non-conformity reports (NCRs) whenever deviations are identified. This applies to deviations in products,

internal processes or organisational matters. Feedback and concerns raised by customers or end-users are also logged as NCRs in the internal system. These can relate to product performance, usability, documentation or other end-user related issues. Quality managers are responsible for the handling of NCR cases and ensure that the correct product managers, engineers or other relevant roles are involved in resolving each case. This ensures that remediation actions are handled by the individuals or teams with the appropriate expertise.

In addition, Jotron's global support department plays a central role in remediation. The support team handles customer cases, oversees investigations and coordinates corrective actions when needed. The support process includes structured case reviews, the involvement of engineering teams when required and complete documentation of the case life cycle.

During business development, the sales phase, and the execution of customer projects, Jotron maintains close and regular communication with customers and end-users. This includes meetings, technical discussions, product demonstrations and operational feedback sessions. Such engagements enable us to understand user needs, assess product performance in practice and ensure safe and effective operation during the entire product's lifetime. Our involvement in industry forums and standardization groups provides another channel for engagement with a broader set of stakeholders, including regulators, operators, safety experts and other market participants.



Governance information

ESRS G1 Business conduct

Jotron’s business conduct is grounded in a strong organisational culture built on enthusiasm, respect and precision. Responsible behaviour and high ethical standards are essential to maintaining trust with customers, suppliers, business partners and society. As a global company, we recognise that transparent governance, clear expectations for employees and robust internal controls are critical to preventing misconduct and supporting long-term value creation.

IMPACTS, RISKS AND OPPORTUNITIES

Jotron views corporate culture as a competitive advantage and thus invests significantly in our people and culture. A corporate culture that promotes responsible business conduct also minimises the risk of involvement in corruption incidents. Given Jotron’s global network of customers, suppliers, and business partners, the risk of corruption remains unavoidable. Another material risk to the business is the threat of severe cyber-attacks and information security breaches. Reporting on cybersecurity is not included in this sustainability statement.

POLICIES, ACTIONS AND TARGETS

The Jotron platform outlines Jotron’s vision, mission, values, attributes and brand image. With the vision of being a world leader and the mission of making journeys safer for anyone, a strong corporate culture built on enthusiasm, respect, and precision is key.

Jotron has implemented ethical guidelines that describe the principles governing our operations and the behaviour we expect from our employees at all levels. These guidelines are intended to provide support in the performance of tasks and in deci-



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IMPACT, RISK OR OPPORTUNITY		UPSTREAM	OWN OPERATIONS	DOWN-STREAM	SHORT TERM	MEDIUM TERM	LONG TERM
Corporate culture							
Opportunity	Strong corporate culture as a competitive advantage driving the company towards our shared goals.		✓		✓	✓	✓
Corruption and bribery							
Risk	Risk of the company being involved in incidents of corruption when having suppliers and customers across the world.	✓	✓	✓	✓	✓	✓
Cybersecurity							
Risk	Severe cyber-attack causing halt in business operations and/or information security breach		✓	✓	✓	✓	✓

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sion-making processes. They are applicable to all employees and contracted personnel, as well as all natural and legal people (and their respective employees) that perform services for or on behalf of Jotron. The guidelines set expectations across a range of areas, including corruption and bribery.

In addition to our ethical guidelines, Jotron outlines expected behaviours in job descriptions for all employees and leaders specifically. Leaders are expected to take responsibility for achieving Jotron's goals, have the courage to challenge established truths, support agreed-upon change processes, stimulate creativity and contribute to developing new ideas, involve and develop employees, seek and provide constructive and clear feedback, communicate clearly, and show care for colleagues.

Jotron's responsibilities within business conduct are further supported by its corporate governance structure. Each corporate

function has defined responsibilities and mandatory monthly, quarterly or annual reporting to senior management, ensuring oversight of ethics, compliance and internal controls across the organisation.

The quality director is responsible for the group's non-conformity system and internal audit process, which includes monitoring deviations related to integrity, ethical behaviour, and compliance. The sustainability director monitors impacts, risks and opportunities, including those related to responsible business conduct. The procurement manager oversees supplier risk assessments, including corruption-related risks.

CORRUPTION AND BRIBERY

Training and awareness

Jotron has mandatory computer-based training on anti-corruption and ethical guidelines, covering all employees. Through the training, employees learn why we have zero tolerance to corruption and what you should

be aware of as an employee. The course includes the definition of corruption, the company's policy, critical considerations, and practical cases on topics such as gifts, hospitality, events and seminars. Employees are encouraged to seek guidance from their superiors if they have any doubts.

100 per cent of the employees have received training.

Incidents of corruption and bribery

In 2025, Jotron did not have any confirmed incidents of corruption or bribery.

There were zero confirmed incidents in 2025.

Whistleblowing

Jotron has established routines to ensure that serious concerns within the company are brought to light, so that measures can be

taken against them. Our goal is to create an environment where employees at all levels feel confident in reporting such concerns internally, without fear of facing negative consequences. Employees are encouraged to report concerns to safety representatives, HR, or the nearest manager with personnel responsibility, unless the concern relates to this manager – then it should be reported to the manager's immediate superior.

At the start of 2025, Jotron introduced the Speak Up Channel on our website, designed for external stakeholders to securely report serious concerns. This channel enables stakeholders to report suspected violations of laws, regulations and ethical guidelines, as well as other serious concerns linked to Jotron's operations and activities. Reporters have the option to remain anonymous. To ensure proper handling of these concerns, Jotron has implemented a detailed procedure for the Speak Up Channel, which is outlined on our website.



VISION

WORLD LEADER



MISSION

SAFE JOURNEY

Our purpose is to make the journey safer and more reliable for anyone travelling on land, by sea and in the air.

VALUES

Our core values are

**PRECISION
ENTHUSIASM
RESPECT**

ATTRIBUTES AND BRAND IMAGE

We are supportive team players, solution-driven technologists and developers, and our customers are always our top priority.

We will never compromise on excellent service, the best tailor-made solutions, and reliable products our customers can trust.

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Jotron's sustainability ambitions are grounded on respect for people and the planet. We are enthusiastic about advancing our sustainability pillars, and we measure our progress with precision.