



TE Connectivity Norge AS Norwegian Transparency Act Report 2024

Background

This is the annual Norwegian Transparency Act Report (**Report**) for TE Connectivity Norge AS (**TE Norge**). This Report has been prepared in accordance with the *Norwegian Transparency Act (lov 18. juni 2021 om virksomheters åpenhet og arbeid med grunnleggende menneskerettigheter og anstendige arbeidsforhold (åpenhetsloven))* (**the Act**) for the period 1 October 2023 to 30 September 2024 (**FY2024**) (**Reporting Period**).

Commitment to Human Rights

TE Norge is committed to promoting and supporting a culture of corporate compliance and ethical behaviour and endorses the implementation and promotion of ethical business practices to protect the fundamental human rights and decent working conditions of workers in our value chain. We are committed to taking actions to help ensure that there is no forced labour, child labour or human trafficking in our operations or within our supply chains.

Our commitment covers internationally recognized human rights principles, including the United Nations (UN) Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, ILO Fundamental Conventions, ILO Declaration of Principles concerning Multinational Enterprises and Social Policy, and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. TE has also been a signatory to the United Nations Global Compact since 2011, and we report annually on our progress through our Corporate Responsibility Report and other country-specific reports available at [Disclosures | Corporate Responsibility | TE Connectivity](#).

In June 2024, TE Connectivity joined the Responsible Business Alliance (**RBA**) as an affiliate member to further our commitment to supply chain excellence in social, ethical and environmental sustainability and to promote responsible and sustainable business practices throughout our global supply chain.

Structure, operations and supply chains of TE

TE Norge is an indirect wholly owned subsidiary of our global parent company, TE Connectivity plc (**TE**), and is subject to TE Global Policies (as defined below) and processes, which are explained in the following paragraphs, to provide a common enterprise-wide approach to managing human rights and related compliance.

TE is a public company listed on the New York Stock Exchange and is a global industrial technology leader creating a safer, sustainable, productive, and connected future. Our broad range of connectivity and sensor solutions enable the distribution of power, signal and data to advance next-generation transportation, energy networks, automated factories, data centers, medical technology and more. With more than 85,000 employees, including 9,000 engineers, working alongside customers in approximately 130 countries, TE ensures that EVERY CONNECTION COUNTS. TE manufactures products in over 25 countries worldwide.



In the Reporting Period, TE's supply chain includes suppliers of raw materials, commodities, components, and other services required to support its operations. TE's global supply chain comprised approximately 33,000 active direct and indirect suppliers.

The business activities of TE Norge consist of engineering, sales & marketing and quality control activities. The sales and marketing activities mainly relate to the Aerospace & Defense and Energy markets. Products sold include connectors, relays, switches, fiber optics, sensors, filters and tubing. The engineering activities focus on development of Integrated Level and Quality sensor systems for DEF and fuel tanks for the Industrial and Commercial Transportation markets, including the truck, bus, agriculture and construction markets. However, effective December 2023 or the first quarter of the Reporting Period, TE closed its engineering facility in Bergen, Norway, which resulted in a decrease of the number of employees to approximately 10. All TE Norge employees are required to comply with the TE Connectivity Guide to Ethical Conduct (explained below) as a condition of their employment and must undergo annual on-line Ethics training and certification.

TE Norge's supply chain comprises approximately 44 direct and indirect suppliers, which includes services required to support its operations.

Corporate Governance

Expanded ESG Governance Model. Our Human Rights Program at TE has been historically governed in partnership with the legal and human resources departments, who set forth policies, training and due diligence. Our Executive Vice President and General Counsel and Chief Human Resources Officer are briefed quarterly on our progress. TE and TE Norge's Board of Directors are also informed at least annually on the progress of our Human Rights Program.

During the Reporting Period and into FY2025, TE realigned its ESG governance model to further define our Leadership Network which includes executive sponsors and decision-makers from different functions within TE including Legal, Human Resources, Operations, Supply Chain, Finance and is led by our Global Government Affairs team. We then added a cross-functional Core Team, which consists of functional owners, working group leaders and segment/business unit sustainability leaders with the goal to coordinate across TE. This Core Team develops and drives TE's ESG strategy and workstreams. In addition, a new ESG Regulatory Impact Assessment Task Force (**Task Force**) was also created as a gatekeeping function to monitor the regulatory landscape and assign ownership for compliance with each regulation. This Task Force will support the evolving ESG regulatory landscape moving forward.

Establishment of TE Human Rights Committee. During the Reporting Period, TE also established an enterprise-wide Human Rights Committee (**Committee**) whose functions include, but are not limited to:

1. screening and assessing areas of the business to identify gaps or risks to the business in relation to Human Rights obligations;
2. preparing action plans to address any risks or gaps identified in relation to the above;
3. reviewing current company policies and suggesting and implementing any changes required as a result of those reviews;



4. implementing additional due diligence processes; and
5. generally evaluating salient Human Rights issues that may arise from time to time in relation to TE's value chains.

The Committee includes representatives from several functions, including Human Resources; Government Affairs; Procurement; Supply Chain Compliance; Operations; Environmental, Health & Safety (EH&S); Ombudsman; and Legal.

The Committee began meeting in January 2024 and has assessed the results of an Enterprise Risk Assessment conducted in FY2023 via a third-party consultant in order to strengthen our Human Rights Program, due diligence and remediation processes.

The Enterprise Human Rights Risk Assessment identified 10 key human rights issues to address. In FY2024, the Committee focused on three projects: health and safety in TE and supplier facilities, climate change gap assessment and supply chain due diligence.

Labour and Human Rights Risks and Measures Taken

Policies on Human Rights

TE, including TE Norge, is committed to conducting business in responsible ways and addresses fundamental human rights and decent working conditions through our foundational policies. All TE entities are required to adhere to TE's policies, including the following (collectively **TE Global Policies**).

1. **TE Connectivity Guide to Ethical Conduct (Ethical Conduct Guide)**, outlines TE's commitment on fair treatment and human rights for employees.
 - a. Amongst other requirements, the Ethical Conduct Guide sets out TE's commitment with respect to Human Rights, Social Responsibility, and Global Corporate Citizenship. It prohibits all forms of forced, trafficked or child labour, and any activity that violates individual dignity, and prohibits any form of physical punishment, abuse and harassment.
 - b. All TE employees are required to comply with the Ethical Conduct Guide as a condition of their employment.
2. **TE Global Human Trafficking and Modern Slavery Policy (TEC-01-71)** provides the following:

TE, including TE Norge, is committed to a work environment and value chain that is free from human trafficking and slavery, which for purposes of this policy, includes forced labour and unlawful child labour. The policy further:

- a. prohibits human trafficking and sets out TE's commitment to a work environment and supply chain that is free from human trafficking and slavery, which expressly includes forced labour and unlawful child labour;
- b. prohibits numerous practices connected with human trafficking;
- c. stipulates that TE will develop and deploy appropriate training, including annual training for third-party contractor personnel and TE employees who have direct responsibility for TE's operations and supply chain management;



- d. provides that any personnel who violate the policy may be subject to appropriate disciplinary and/or corrective action up to and including termination of employment or contract;
 - e. stipulates that TE will communicate the principles and requirements set forth in the policy to suppliers, subcontractors and agents.
3. **TE Connectivity Global Human Rights Policy (TEC-04-37)** broadly defines how TE respects human rights in our operations, supply chain, and the communities in which we operate.
4. **TE Connectivity Reporting and Investigating Misconduct Policy (TEC-01-57)** establishes procedures and responsibilities for reporting alleged violations of applicable laws or regulations, the Ethical Conduct Guide, TE policies and procedures, and for the investigation and any corrective action related to those reports. The policy also includes a prohibition against retaliation and an enhanced whistleblower protection.

Risk Assessment and Due Diligence

Based on the Enterprise Human Rights Risk Assessment conducted in FY2023 mentioned above, TE identified child labour and forced labour and human trafficking, including all forms of slavery as human rights issues that are most salient for our operations due to the industry, products and locations of our operations and business partners (including our suppliers) globally.

Due Diligence Measures Undertaken Within TE

Employee Training. As part of TE's company-wide global training on TE's Ethical Conduct Guide, every TE employee is required to participate and certify annually in a training session, which includes human-rights content such as anti-harassment and non-discrimination and how to report concerns. During the Reporting Period, TE had a 99%+ completion rate for this training, which included active employees on TE payroll at the time of the commitment campaign.

Human Resources (HR) Internal Human Rights Survey. In addition to our annual Ethical Conduct Guide training and certification, we conduct an annual internal Human Rights Survey seeking confirmation from our key HR leaders with global and/or regional responsibilities and members of the TE Law Department who have oversight of labour and employment-related matters that the individual is not aware of any labour and employment practice maintained by TE that would violate the Ethical Conduct Guide or evidence violations of human rights or decent working conditions.

TE Facility Audits. As a new RBA member, we have increased visibility into the results of the audits performed by our customers at TE facilities. Third party auditors conducted nine RBA Validated Assessment Program audits at TE facilities in FY2024 to support customer due diligence and improve human rights in our operations. This allows TE to continue to enhance our due diligence by aligning remediation plans, including corrective actions, training and other measures to ensure best practices within our operations, to continually improve our Human Rights Program. In the Reporting Period, there were no customer requested audits of TE Norge operations.



Due Diligence Measures Undertaken With Suppliers

Supply Chain Policies and Processes. TE Norge seeks to engage suppliers whose values and supply chain practices align with TE's commitment to complying with fundamental human rights and decent working conditions. TE, including TE Norge, has several compliance mechanisms aimed at addressing supplier compliance, explained in the following paragraphs:

1. **TE Connectivity Supplier Code of Conduct (TEC-1015).** In the Reporting Period, TE renamed and updated the TE Connectivity Guide to Supplier Social Responsibility to the TE Connectivity Supplier Code of Conduct (**Supplier Code**), since the scope has expanded beyond just social responsibility to emphasize the importance of other aspects of supplier responsibility including ethical, environmental, and health and safety. This update aligns with the latest international frameworks, standards, and legislation governing responsible business behaviour including the latest RBA Code of Conduct. The updated Supplier Code includes a prohibition on suppliers retaining workers' papers and recruitment fees paid by workers. It also added a flow down of these requirements to the supplier's employees, personnel, agents, subcontractors, and sub-tier suppliers, when conducting business with or on behalf of TE. The Supplier Code was revised in June 2024 and was communicated to our suppliers via the TE Supplier Portal. The Supplier Code is also available to the public at [Disclosures | Corporate Responsibility | TE Connectivity](#).

The Supplier Code reflects TE's commitment to maintaining the highest standards of ethics, sustainability and social responsibility throughout our value chain. It sets out in detail TE's expectations for its suppliers with respect to business conduct, decision-making, and business interaction. It outlines key principles and behaviours, based on TE's Core Values (set out in the Ethical Conduct Guide), and emphasizes the principles and behaviours required of suppliers and sub-suppliers. It addresses TE's labour and human rights expectations as follows:

- a. freely chosen employment;
 - b. prohibitions on child labour;
 - c. working hours;
 - d. wages and benefits;
 - e. humane treatment;
 - f. non-discrimination;
 - g. freedom of association;
 - h. metals materials / supplies from Conflict-Free Mines;
 - i. environmental impact on local people;
 - j. unlawful eviction of land; and
 - k. prohibits violent security forces.
2. **Supply Chain Contracts.** The Supplier Code is incorporated into TE's standard contract terms including our master supply chain contracts and Global Terms and Conditions of Purchase, which provide TE the contractual right to conduct an audit for compliance with the Supplier Code and the right to terminate an agreement for non-compliance. In pertinent part, the contractual terms include the following:
"Supplier warrants that all performance under this Order [or Agreement] will comply



with relevant Laws, including but not limited to product compliance, tax, environmental, animal protection, human rights, employment, labor, data protection, and health and safety laws. Supplier also warrants their understanding of, agreement to, and conformance to the TE Connectivity Supplier Code of Conduct ("TEC-1015") as well as all documents referred to therein, found at <https://supplierportal.te.com>. Supplier will also flow down these requirements to Subcontractors."

3. **Supplier approval and onboarding processes.** As part of TE's process in determining whether to engage a new supplier, TE maintains and TE Norge follows an internal Supplier Onboarding Process which is managed through a supplier set-up application. The Supplier Onboarding Process, among other things, involves following the guidelines set out in TE's internal Supplier Approval Policy which sets out that all TE suppliers, including TE Norge suppliers, agree to comply in principle with the Supplier Code as referenced above.
4. **Business Partner Risk Assessment / Screening.** TE maintains a process for assessing the risk posed by its business partners including suppliers in relation to human rights practices in its operations and supply chains. This process involves:
 - a. **Screening TE's Business Partners.** TE screens business partners, including suppliers, as part of the onboarding process and via an ongoing automated daily rescreening of our suppliers to determine if they are listed on any sanction or restricted party lists. We take a proactive risk management approach with certain material suppliers by monitoring their business conditions and using a commercial risk intelligence platform to receive alerts of potential associations with high-risk suppliers or third parties in their supply chain.
 - b. **Business Partner Management (BPM).** We further utilize a Business Partner Management (BPM) program that provides a targeted due diligence and screening process based upon objective risk assessments to retain and manage certain in-scope business partners ensuring their adherence to TE's Core Values and preventing potential harm to TE's brand and reputation by limiting our exposure to potential bribery and corruption. This process helps ensure that our business partners operate in a manner that is ethical, in accordance with the law and reflects our Core Values. We utilize this BPM process through our supplier onboarding and through continuous monitoring of our existing business partners.
5. **Supply Chain Mapping.** As part of the updates to the Supplier Code, supply chain mapping criteria was updated. Due to increasing business continuity, sustainability and compliance requirements, TE requires its suppliers to conduct and support necessary supply chain mapping initiatives, including but not limited to efforts sufficient to meet the highest documentation standards that demonstrate 'Supply Chain Mapping Evidence' which comprises:
 - a. the identity and location of suppliers' subcontractors and suppliers; and
 - b. the origin of its products and any component and raw materials in its products.Supply Chain Mapping Evidence must meet the standards to comply with TE's request, applicable regulatory requirements, supply chain security programs, directives, or guidance from the applicable government authorities.
6. **Supply Chain Data Management System.** Names and addresses of all our Tier 1 suppliers, as well as the commodity codes of the goods or services they provide,



are recorded systematically in a TE supplier data management procurement system. We maintain records of our monitoring activities including the BPM approval status for in-scope suppliers, the TE Supplier Code acceptance responses (as further described below), and other metrics for product compliance surveys. TE, including TE Norge, is in the process of strengthening our risk assessment process. As our process matures, we will continue to take the following risk criteria into account: geography, market, commodity, and spend. As mentioned below, we continued to evaluate risk analytics tools during the Reporting Period to enhance the tracking systems we use for risk assessment.

Supplier Due Diligence, Findings & Remediation. TE also has established practices to help monitor, identify and assess potential adverse impacts on fundamental human rights and decent working conditions as part of our due diligence measures aimed to address supplier compliance, which is managed by our TE Supplier Responsibility Program (**SRP**), which includes the following (1) TE Supplier Code of Conduct (TEC-1015) acceptance which ensures our suppliers are aligned with our values and principles through acceptance of the TE Supplier Code, (2) an annual Human Trafficking and Slavery Survey (**HTS Survey**), (3) supplier audits performed by a third-party auditing firm with qualified auditors who specialize in corporate social responsibility assessments and the technical audit process (**SRP Audit**), (4) supplier remediation, and (5) supplier training.

1. **TE Supplier Code of Conduct Acceptance.** We annually track and report the number of suppliers that accept the TE Supplier Code, which is disclosed in our annual TE Corporate Responsibility Report. By accepting the TE Supplier Code, suppliers are agreeing to adhere to and embrace the principles and behaviours of the policy including implementing programs designed to achieve conformance with the Supplier Code.
2. **Human Trafficking and Slavery Survey.** TE conducts an annual HTS Survey of certain suppliers using the Slavery and Trafficking Risk Template (**STRT**), an industry standard survey used to collect human trafficking and slavery data from supply chains. The HTS Survey and supplier information gathering is facilitated by a third-party compliance service (**TPCS**) provided by a leading software-as-a-service solution accessed by TE's suppliers. Supplier response to the HTS Survey is voluntary.
 - a. In December 2022, TE launched its second HTS Survey. This campaign ran through December 2023. TE surveyed approximately 3,700 suppliers, received approximately 1061 responses, which is equivalent to a 28% response rate, which tripled the number of surveys sent to suppliers and increased our response rate compared to the prior year's survey.
 - b. To improve our due diligence processes, we assessed our current practices against new regulations and industry best practices. In FY2024, TE formed a cross-functional team to analyze supply chain risk factors, evaluate various risk analytics and data collection tools and explored other human rights survey options for our next campaign. We are continuing to enhance our due diligence by aligning remediation plans, including corrective actions, audits, training, and any other measures to ensure supplier compliance.
3. **SRP Audits.** The SRP Audits validate supplier's values and principles outlined in TE's Supplier Code and identifies areas of concern related to forced labour/human trafficking, child/young labour, discrimination, compensation, working hours, environment, health & safety, freedom of association, ethics and subcontracting.



TE's third party auditors conducts detailed on-site audits and follow-up audits as needed to monitor corrective action plans. In the Reporting Period, TE expanded our SRP Audits to other countries / regions and conducted 91 SRP Audits of suppliers, based on a risk-based approach that includes consideration of geography, markets, commodities and spend with suppliers, which did not include any TE Norge suppliers. Most of the audit findings were related to compensation, working hours, health & safety, and environment.

4. **Supplier Remediation.** The TE Supplier Code states that remediation can include a number of activities including working together to create a corrective action plan for achieving compliance in a reasonable time frame, defining a roadmap for gradually increasing standards and expectations to enable capacity building with our suppliers, and up to termination of a supplier relationship when serious compliance issues are not remediated despite repeated notifications and attempts. Our Supplier Code also provides guidance on a management system that our suppliers should implement including risk assessment and risk management, audits and assessments, training, and a corrective action process among other elements. We also encourage our suppliers to promptly report any concerns of potential violation of laws, regulations, and TE policies via TE's grievance mechanism explained below.

The following are examples of remediation conducted in FY2024:

a. Pay Deductions for Infractions:

- Finding: The audit revealed that the supplier imposed fines for various infractions such as, forgetting to clock in and dormitory room leaders were fined if their dormitory was rated the worst.
- Remediation: The follow-up audit confirmed that the supplier had revised their policy, eliminating the fine system and the updated policy was posted on the factory bulletin board.

b. Lack of Social Insurance:

- Finding: The audit identified that the supplier did not provide social insurance (retirement, medical, maternity, accident, and unemployment insurances) for 14 out of 52 employees.
- Remediation: The follow-up audit confirmed that the supplier had provided social insurance for all 52 employees, in compliance with legal requirements.

c. Worker Safety Violations:

- Finding: The audit uncovered several worker safety violations, including the lack of a legally compliant evacuation plan, insufficient and non-functional exit signs on the factory floor, absence of emergency lighting for the evacuation route on the 2nd and 3rd floors of one workshop, and the absence of an explosion-proof lamp in the chemical warehouse.
- Remediation: The follow-up audit confirmed that the fire alarm button locations were identified in all evacuation plans for the production workshop and dormitory; exit signs were installed for the 2nd floor workshop and two exit signs in the 2nd floor dormitory were operational; emergency lighting was installed for the evacuation route on the 2nd and 3rd floors of the workshop; and an explosion-proof lamp was installed in the chemical warehouse.



5. **Supplier Training.** In FY2024, our top 100 suppliers received a live training on human rights regulations during TE's Supplier Day event. At our Supplier Day event, we invited our top 100 suppliers to focus on key compliance areas, including product environmental compliance, our Scope 3 GHG emissions and human rights. We emphasized clear expectations for suppliers to enhance transparency and due diligence, including adopting a Code of Conduct aligned with the RBA, implementing a grievance mechanism and building capacity within their supply chains.

Grievance Mechanism

Office of the Ombudsman Program. The Office of the Ombudsman acts as an independent, impartial and confidential resource with whom employees, suppliers, investors, customers, and other third parties can ask questions or raise concerns about potential violations of applicable laws, regulations, the Ethical Conduct Guide, TE policies and procedures, and TE's Core Values. The Ombudsman reports directly to the Audit Committee of the TE Board of Directors and ensures that all reported issues are investigated, communicated to all affected stakeholders and resolved in an appropriate manner. Often, the post-investigation corrective actions enable TE to make process improvements or otherwise rectify an inefficiency for the benefit of TE or its employees.

The Office of the Ombudsman services all TE entities globally. Therefore, all TE, including TE Norge, employees or third parties are encouraged to use this service to report any actual or potential breaches or concerns of fundamental human rights or decent working conditions. Information about the program is publicly available on the TE website at [Office of the Ombudsman | TE Connectivity](#).

Our Office of Ombudsman continues to collect and monitor grievances related to human rights. In FY2024, no significant human rights complaints were raised to the Ombudsman.

TE Implementation Plan

TE including TE Norge continues to design and implement a framework to review the effectiveness of the controls it has implemented. As part of this framework, TE is committed to developing appropriate processes for investigating, assessing, and handling risks related to fundamental human rights and decent working conditions in its business and supply chains by:

1. Further developing and enhancing existing procedures and mechanisms; and
2. Supplementing its cohesive response to fundamental human rights and decent working conditions with additional policies, mechanisms and strategies, as it deems necessary.

Continuous Improvement

TE applies a continuous improvement approach. Some strategies which TE is considering implementing over successive reporting periods include the following:

1. TE intends to develop a structured remediation approach by drafting procedures and guidelines to set out a defined plan if a human rights event or concern is detected and prescribe guiding principles for remediation.



2. TE intends to continue to enforce and promote awareness of the Ethical Conduct Guide, TE Supplier Code and Global Human Rights Policy.

Conclusion

TE and TE Norge are demonstrably committed to ensuring that it complies with its human rights obligations. As described above, TE Norge takes active steps to review and improve its fundamental human rights and decent working condition processes on an ongoing basis.

Our Ethical Conduct Guide, Global Human Rights Policy, Supplier Code and additional details on the TE Human Rights Program may be found in TE's Corporate Responsibility Report and country-specific reports available at [Disclosures | Corporate Responsibility | TE Connectivity](#).

/S/ Malin Maria Tränk

Malin Maria Tränk, General Manager

Board Members:

Malin Maria Tränk, General Manager

Sheldon Witmer

Jeroen Thomas

Harold G. Barksdale

For and on behalf of TE Connectivity Norge AS

This Report was approved by the General Manager and Board of Directors of TE Connectivity Norge AS at a duly noticed meeting and then executed. The Report shall be placed on the Corporate Responsibility section of the TE Connectivity website at [Disclosures | Corporate Responsibility | TE Connectivity](#).