



Transparency Act Report

Airthings' journey June 2024

Contents

About the Transparency Act Report	3
Environmental and social risk methodology	4
Policies, principles and guidelines	5
Supplier classification level of importance	6
Airthings' 1st tiers and manufacturers	6
Highlights in reporting period	7
Goals for 2024	10
Conclusion	11
Appendix Data Sheets	12

About the transparency report

Building a sustainable future: early achievements and continuing efforts in Airthings' compliance journey

This report documents Airthings ASA's compliance with the Transparency Act, due by June 30, 2024. It covers data from June 2023 to June 2024, gathered from our offices in Oslo, Fort Worth (closed in 2024), Stockholm, and the US Radon Lab in Massachusetts.

Airthings strives to empower the world to breathe better, focusing on environmental benefits across "planet, people, and business governance". We aim to enhance our supply chain interactions by adhering to and exceeding laws and regulations that uphold human rights, decent working conditions, diversity, inclusive labor standards, and environmental protection.

The report adheres to the UN Guiding Principles on Business and Human Rights, the OECD's Due Diligence for Responsible Business Conduct, and Airthings' policies on human rights, diversity, inclusion, and supplier conduct.

We view our guiding principles as dynamic, continually evolving through rigorous feedback to better meet our objectives. These include our commitment to zero tolerance for harassment and human rights violations and fostering a diverse and inclusive workplace.

As signatories of the UN Global Compact, we strive to effectively assess and mitigate various risks. Our business practices are designed to reflect our dedication to the United Nations Sustainable Development Goals (SDGs), particularly focusing on SDGs 3 (Good Health and Well-being), 8 (Decent Work and Economic Growth), 11 (Sustainable Cities and Communities), 12 (Responsible Consumption and Production), 13 (Climate Action) 4 (Quality Education), and 10 (Reduced Inequalities).

Airthings is committed to sharing this information with its stakeholders and shareholders through its primary communication channels.

All previous sustainability related reports are available at <https://www.airthings.com/investors/reports> and airthings.com/sustainability.

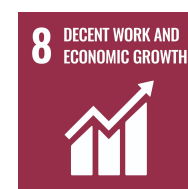
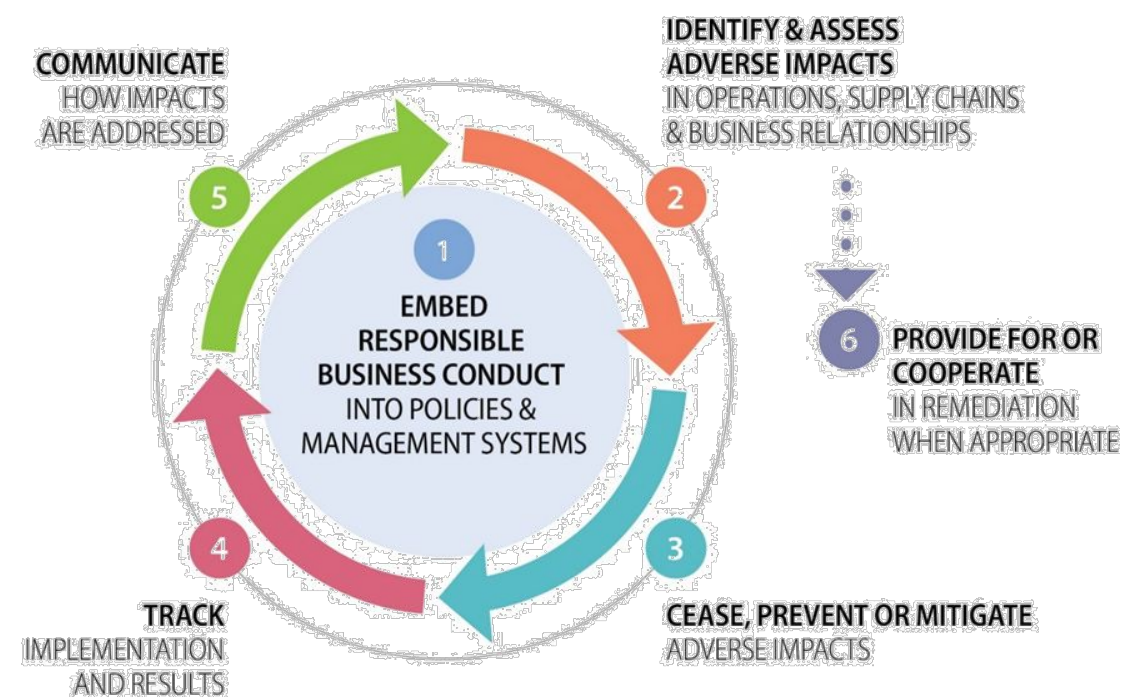
Responsible team

The board of directors (BoD) is responsible for ensuring that Airthings complies with the applicable requirements in the Transparency Act. The BoD should annually review the objectives, strategy and organization of the internal control system. Airthings' transparency act team is responsible for overseeing the implementation of the suppliers' code of conduct and ensuring that any breaches are investigated by the assessment team.

The responsible business conduct framework is owned by COO, Audhild Randa. It is monitored by Sustainability Manager, Erwin Hasselbrinck and Supply Chain Manager, Karolina Skuland. Any inquiries should be sent to transparency@airthings.com or through our anonymous [report an incident platform](#); likewise, you can find an overview of the [Airthings guidelines to the Transparency Act](#).

All major inquiries can be reported through the whistle-blower channel on the Airthings website. The Airthings assessment team will be responsible for the due diligence of any case reported through the whistle-blower mechanism.

DUE DILIGENCE PROCESS & SUPPORTING MEASURES



Environmental and social risk methodology

An approach to stakeholder interaction

Stakeholder engagement

As a first step, Airthings has strategically identified material topics by engaging internal and external stakeholders and gathering insights on environmental, social, and governance (ESG) aspects. We've analyzed industry benchmarks and sustainability standards like GRI and CSRD. We monitor regulations, and emerging trends to prioritize issues based on their impact on our business and stakeholders.

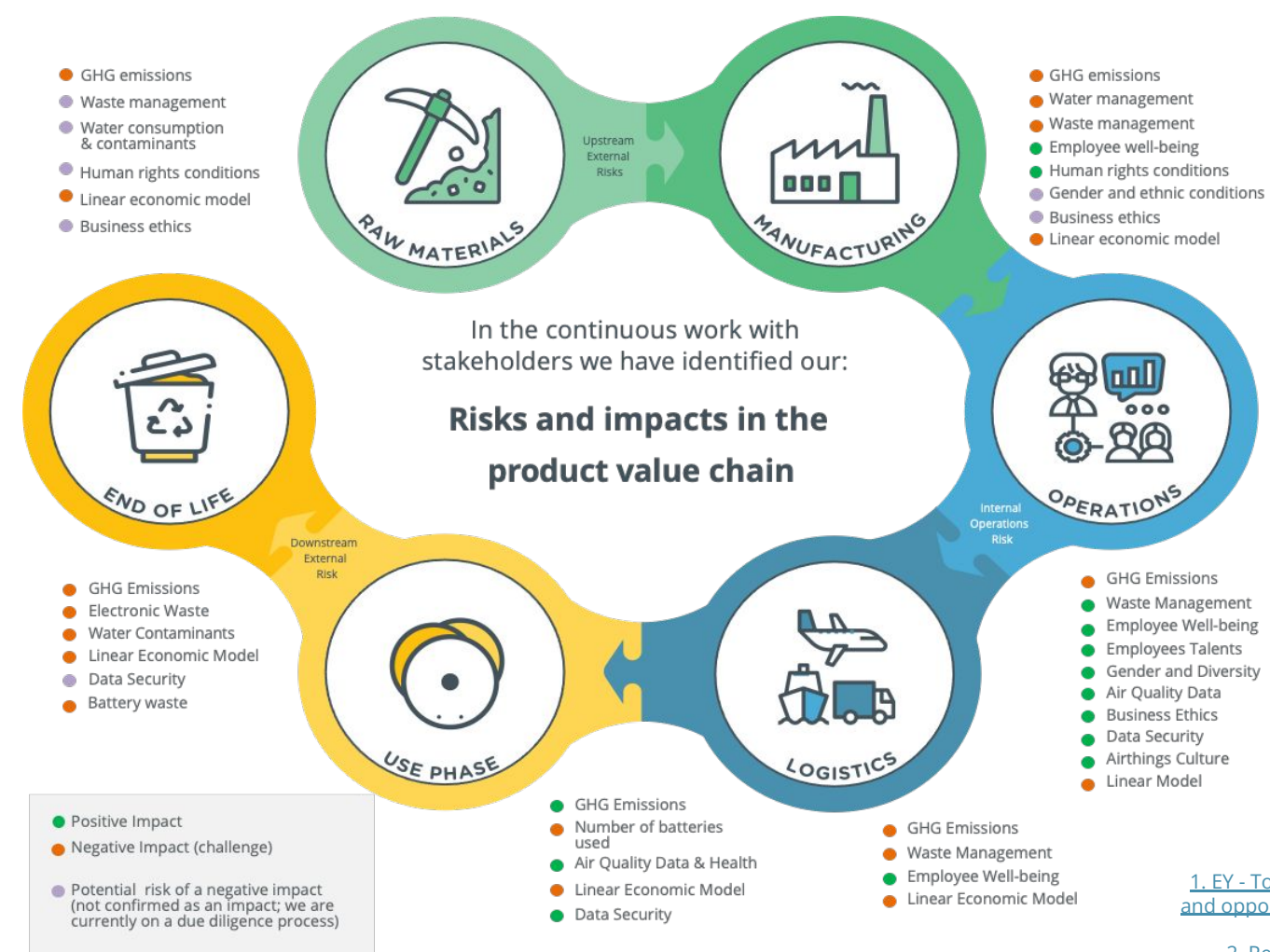
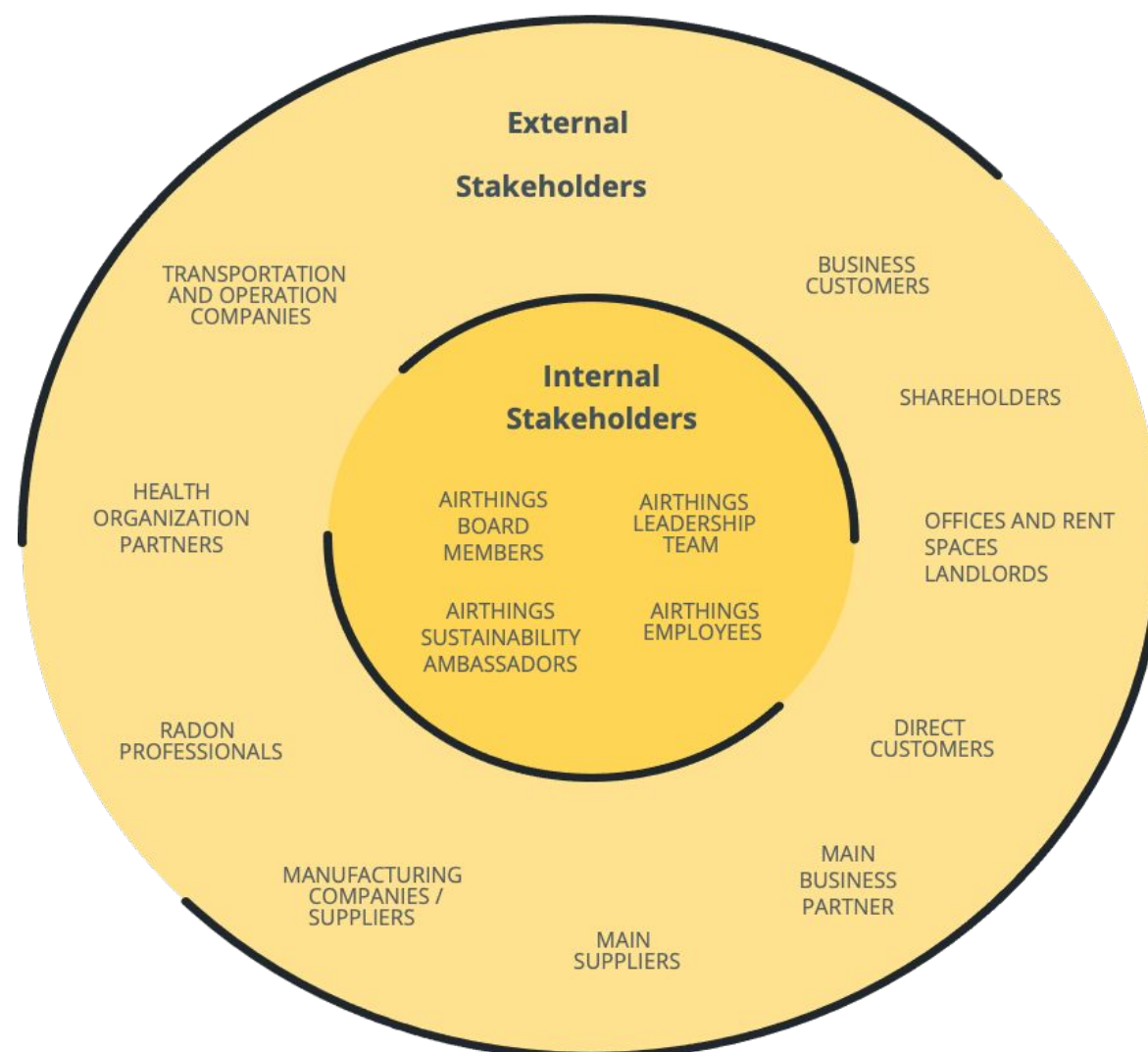
The assessment involves ongoing discussions, stakeholder engagement, and surveys. The next graph shows our stakeholders.

Overview in the electronics sector supply chain

As a second step, we conducted an ESG risk assessment focusing on available information for the electronics sector based on the [Responsible Business Alliance](#). The primary risk in the tech sector lies in post-2nd tiers with raw material sourcing, posing threats like environmental degradation, child labor, human rights abuses, and hazardous chemicals¹. Using this information, we did a preliminary analysis of the potential risks and known impact based on our product value chain, as shown in the graph below.

Based on this, Airthings has begun mapping its suppliers, categorizing them into 1st, 2nd, and 3rd tiers to classify their risk levels later. Currently, we closely collaborate on ESG matters with our 1st-tier manufacturers. Airthings' 2nd-tier suppliers, who produce printed circuit boards, plastics, batteries, and other components, are being assessed through different risk classifications (learn more on pg 6).

Through this approach, we have compiled a comprehensive understanding of ESG risks, guiding the path to identify our material topics.



Ref:
 1. [EY - Top 10 business risks and opportunities for mining and metals, 2023](#)
 2. [Responsible Business Alliance](#)

Policies, principles and guidelines

Airthings strengthens corporate governance: 95% of employees trained on anti-bribery, human rights, diversity and inclusion in the reporting period

Since the last Transparency Report (June 2023), we have continued to strengthen our governance by implementing six policies and guidelines to ensure that we operate as a highly trusted company. To further promote ethical behavior, we introduced new training measures such as anti-bribery and anti-corruption policies and training.

The next graph helps visualize how our governance is organized:



We also provided training on human rights to ensure that all employees are aware of our policies and their role in maintaining the integrity of the organization. These efforts have been a key factor in enhancing our reputation and building trust among stakeholders.



Business ethics and policies

Human Rights, Diversity and Inclusion policy

To ensure compliance with our Human Rights, Diversity, and Inclusion Policy, all Airthings employees are required to read and sign the policy and receive training on human rights, diversity, and inclusion.

In 2023, 95% of employees have read and signed the policy and were trained on human rights and diversity. This policy is also incorporated into our employee handbook to ensure full compliance. The employees missing their signature or training are either on paternity leave or on sick leave during the period. Once they return, they will receive their training.

Anti-Bribery and Corruption policy

As part of our commitment to high standards of integrity and ethical conduct in all our business activities, we have established an Anti-Bribery and Corruption policy to prevent and detect any unethical behavior. This policy applies to all employees, officers, directors, and agents of the company and prohibits bribery and any other form of corruption or illegal activity.

In 2023, 95% of employees have read, signed, and received training on our Anti-Bribery and Corruption Policy to ensure full compliance and understanding. The policy is also incorporated into our employee handbook for ongoing reference and as a preventive measure.

Procurement guideline

We have implemented a procedure requiring cost approval forms for any purchase above 5K USD. Likewise, employees should follow the procurement

guidelines to align with our circular principles, reducing our environmental footprint and ensuring fair materials and working conditions from our suppliers. This structure in Airthings' purchasing processes ensures that the acquired products or services result from transparent, objective, cost-effective decisions, considering social and environmental factors.

Suppliers Code of Conduct

To mitigate indirect environmental and social risks, we established our Supplier's Code of Conduct in October 2021. We developed our code following the Responsible Business Alliance and the Responsible Mining Association standards as a guide. As stakeholder engagement is a priority in our work, we held workshops with our main manufacturers through a participatory methodology to create this policy. Throughout 2023, our main manufacturers in Tunisia, Malaysia and Israel either signed our Suppliers' Code of Conduct, or we approved their code of conduct.

Report and incident - whistleblower program

Airthings maintains a robust whistleblower program with a non-retaliation policy, ensuring anonymity and confidentiality for reporters. An independent Assessment Team handles violations of suppliers code of conduct, human rights and diversity policies. In 2023, one internal report led to plans for inclusive language training in 2024. In Q1 2024, a request for a deeper human rights and decent working conditions assessment concerning a supplier in Israel was advanced; further details are available on page 9.

Supplier classification

Airthings completes 100% supplier assessment based on procurement, country risk, and public documentation

Airthings extends human rights and decent working conditions due diligence to our supply chain, collaborating with suppliers committed to sustainability and ethical practices. The primary tech sector risk lies beyond 2nd-tier suppliers in raw material sourcing, with risks including environmental degradation, child labor, human rights abuses, and hazardous chemicals.

We address these risks through a supplier code of conduct, anonymous grievance mechanisms, life cycle assessments, and policies on circular design, human rights, and anti-bribery. Our 1st-tier manufacturers must conduct due diligence on their suppliers, ensuring compliance with stringent ESG standards.

The Transparency Act team conducts a high-level risk evaluation of our supply chain and business partners, based on Airthings' defined ESG topics and goals. We develop corrective action plans based on supplier feedback.

We classify suppliers as important through:

A) The economical procurement amount from the supplier/business partner purchased by Airthings:

We classify the suppliers based on Procurement Value of over 100,000 NOK per year.

B) Assessing the level of risk in the suppliers'/business partner country of operations:

We rely on the [Civil Liberties Index](#), the [Human Rights Watch Report](#), and the [OHCHR Report](#) for to measure human rights country risks. Likewise, the [environmental performance index per country impact level](#) (EPI), and [corruption country level](#) by Global Risk Profile data set.

C) Second tiers sub-suppliers:

We declare important those with Critical Component for Hardware Products. These are suppliers that cannot easily be exchanged in the manufacturing process.

D) Public information and internal assessments on ESG Policies by the supplier/business partner.

We then research public information found via online and other ESG sources to find policies, guidelines and strategies. If classified as a medium risk supplier, we continue the assessment by sending the [Airthings Suppliers Code of Conduct](#) for signing. If considered a high or extreme-risk supplier, we send the Suppliers Code of Conduct plus a [Supplier's Code of Conduct questionnaire](#).

Airthings' manufacturing is outsourced to companies in Norway, Tunisia, Israel, China, and Malaysia. The main hardware components are sourced from China.

Airthings does not focus on human rights and decent working conditions due diligence for Norwegian manufacturers as they are all classified as low risk.

Tunisia presents human rights risks, including restrictions on free speech, violence against women, and weakened democratic institutions. Vigilant monitoring is essential to address these concerns and ensure compliance with human rights standards ([Human Rights Watch, 2023](#)).

Doing business in Israel carries human rights risks, including the ongoing Israeli-Palestinian conflict, settlements in occupied territories, and concerns regarding the treatment of Palestinian populations. Vigilant monitoring and engagement with suppliers are crucial to addressing these risks and upholding human rights standards in the supply chain ([Human Rights Watch, 2023](#)).

In the context of Airthings' supply chain in Malaysia, the country's political instability has led to concerns about human rights issues. These include investigations, arbitrary arrests of government critics, and a hardline anti-migrant policy. Additionally, the government has expressed threats against the rights of the LGBT community. Although there was a change in leadership, the government's overall approach to human rights has shown little improvement. Airthings must remain vigilant in monitoring and addressing these risks to uphold human rights standards within its supply chain in Malaysia ([Human Rights Watch, 2023](#)).

Operating in China poses human rights risks, including concerns regarding labor rights, freedom of expression, and the treatment of minority groups such as Uighurs and Tibetans. The Chinese government's policies, such as mass surveillance and censorship, have raised alarms ([Human Rights Watch, 2023](#)). Airthings Remains vigilant to our suppliers in China regarding this subject.



Airthings 1st tiers & main manufacturers

Significant progress, with 88% of suppliers classed as low-risk. Yet, 12% still require intensive review

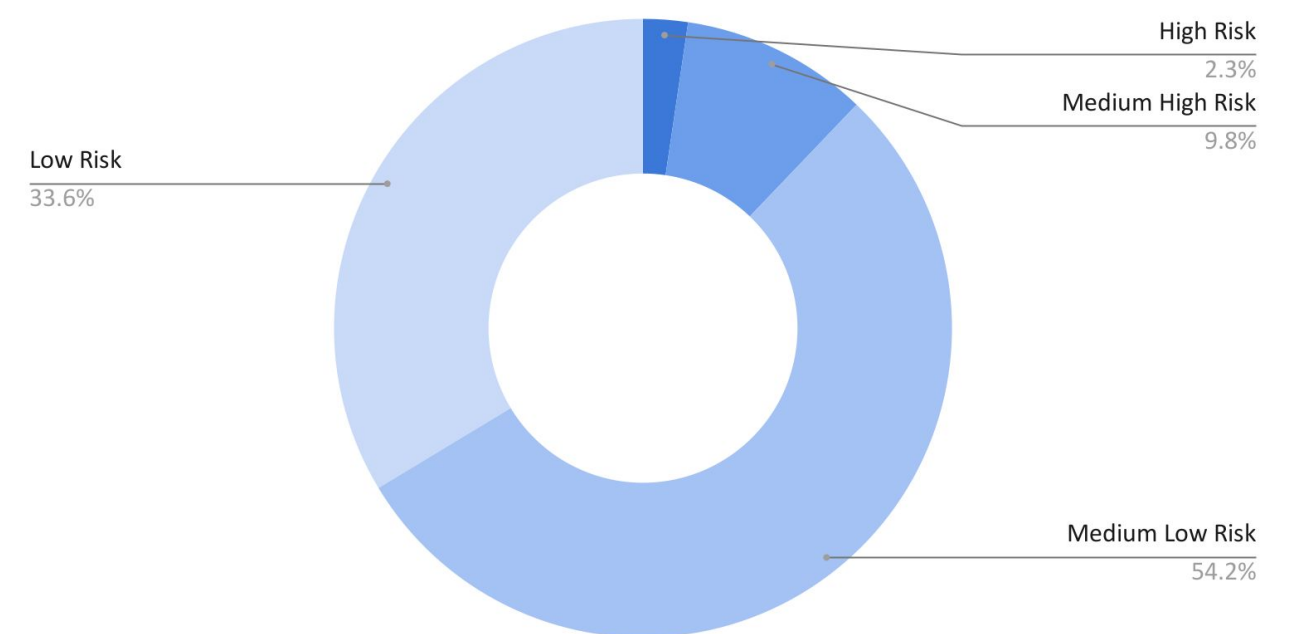
Airthings works actively with manufacturers to ensure transparency and uphold human rights and decent working conditions. By now, all except two of our manufacturers have signed our code of conduct, while one manufacturer has submitted its own code of conduct to us. We are in dialogue with the remaining manufacturers that have not signed our code of conduct and aim for their compliance by the end of 2024. Two of the manufacturers have undergone SMETA (Sedex Members Ethical Trade Audit), which is an ethical trade audit carried out by a 3rd party with ongoing improvements.

Regular audits and visits to our manufacturers in Tunisia and China confirmed compliance with standards, documenting no human rights violations and noting excellent working conditions.

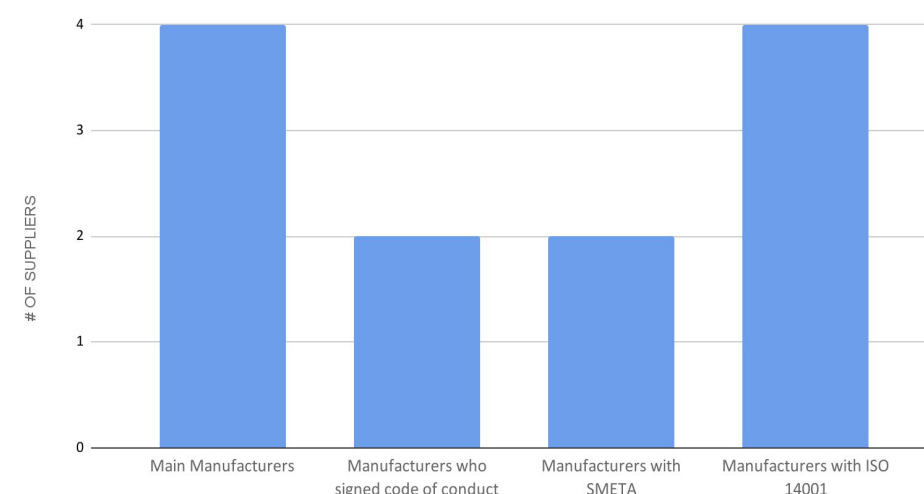
We are addressing discrepancies in transparency with our manufacturer in Israel. They have submitted proof of compliance to several ISO standards (14001, 9001, and 45001), but their failure to provide SMETA reports or similar ESG audit reports is concerning. Future steps include verifying these claims through different platforms, engaging in discussions with the supplier's leadership, seeking legal advice, and implementing a corrective action plan if necessary.

Notably, 100% of key suppliers/business partners have been thoroughly assessed through public documentation and questionnaires. Currently, 88% of our suppliers are low to medium-low risk and require no further assessment, allowing us to focus on the remaining 12% that need additional scrutiny. Of these, high and medium-risk suppliers/business partners 61% have already signed our code of conduct. We are aiming for full compliance by 2024.

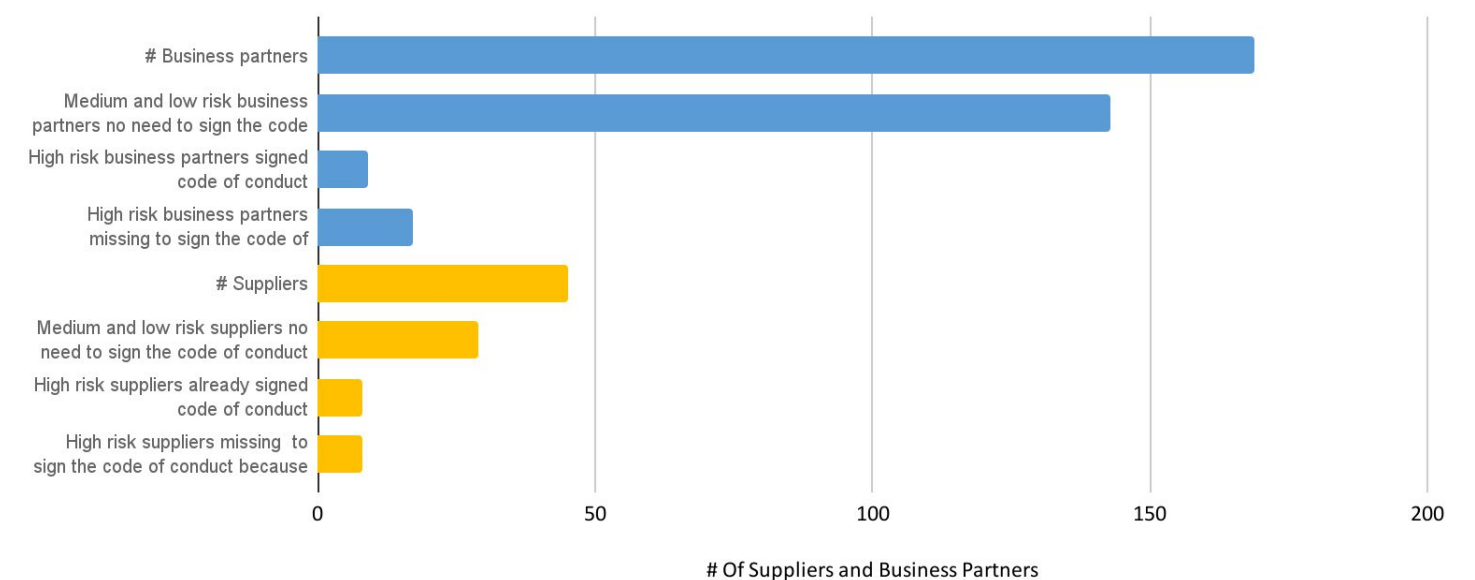
Suppliers/Business partners - Risk Level



Manufacturers policies and compliance



Suppliers vs. Business Partners



Highlights in reporting period

Over 80% of our goals achieved, though 3rd-tier challenges persist due to resource limitations

Map out additional 2nd and 3rd tiers from important suppliers			0	<div></div>	100%
Description	Results and findings	Actions taken			
Enhance our supply chain transparency by extending oversight to include 2nd and 3rd-tier suppliers. This initiative has deepened our understanding of the complexity of raw material origins, aligning our sourcing with ethical and sustainable standards.	<ul style="list-style-type: none">Initiated mapping and due diligence with our main manufacturer of their suppliersIdentified 21 sub-suppliers, with 6 having signed the Code of ConductNoted 4 high-risk and important suppliers that have not yet signed the Airthings Code of ConductIdentified that many sub-suppliers, primarily small local businesses, require further assessmentThird-tier suppliers have not been mapped due to resource constraints that are required for outreach	<ul style="list-style-type: none">Discussed and developed an action plan with our main supplier in Tunisia for the due diligence of their suppliersCommunicated with our Chinese manufacturer to advance sub-supplier mapping and assessmentStarted thorough impact measurement and supply chain analysis using third-party SMETA audits			
Thorough review of important business partners			0	<div></div>	100%
Description	Results and findings	Actions taken			
Cover important business partners with more detailed research and questionnaires for those with high risk.	<ul style="list-style-type: none">100% of the important business partners were reviewed through public documentation50% of the high and medium risk business partners have signed the Airthings Code of Conduct	<ul style="list-style-type: none">Analyzed business partners according to their risk levelsContacted business partners with insufficient information on policies regarding human rights and decent working conditions, environment, and data security online			
Request existing important suppliers to sign Airthings Suppliers Code of Conduct			0	<div></div>	100%
Description	Results and findings	Actions taken			
Strengthen the ethical foundation of our supply chain by requiring all significant and high-risk suppliers to endorse the Airthings Code of Conduct. This initiative is designed to ensure that our suppliers are aligned with our values of integrity and responsibility, promoting consistent ethical practices across all levels of our supply network.	<ul style="list-style-type: none">Achieved code of conduct signatures from 50% of suppliers previously considered high-riskIdentified 30 suppliers and sub-suppliers as important; 13 of these were classified as high risk, with 9 having signed the code of conductNoted that 4 high-risk suppliers are still pending to sign the code of conduct	<ul style="list-style-type: none">Conducted a comprehensive review and classification of all suppliers and sub-suppliers to identify those considered important and high-riskImplemented targeted outreach programs to encourage high-risk suppliers to sign the Code of ConductFollow up communication with high-risk suppliers who had not yet signed the code of conduct to address any concerns or barriers to signing			

Highlights in reporting period

Updated due diligence methodology and SMETA audits drive ethical compliance

Update due diligence assessment

0100%

Description	Results and findings	Actions taken
Our latest due diligence and materiality assessment, conducted in 2021, was updated to reflect insights gained from our work with the Transparency Act. This revision ensured our strategies aligned with current regulatory and operational realities, enhancing our commitment to transparency and accountability.	<ul style="list-style-type: none">We completed 100% supplier assessment based on procurement value (>100k nok), country risk (international risk indexes), and public documentationWe have assessed 214 suppliers throughout the reporting periodWe have made regular in-person visits to 2 of our main manufacturersWe implemented 3rd party audits for 2 of our main manufacturers	<ul style="list-style-type: none">Assessed and enhanced the social performance in high-risk countries and of new suppliersStrengthened responsible sourcing by employing internal tools for enhanced evaluation of our supplier’s risk levels.Initiated comprehensive impact measurement and supply chain analysis with third-party audits.We assessed the full list of our material topics

Review and update safety routines for US office (N/A)

0100%

Description	Results and findings	Actions taken
We reviewed and planned an update of the safety routines for our US office. However, the office closed in Q1 2024 meaning these updates were deemed unnecessary and, therefore, not implemented.	<ul style="list-style-type: none">The US office in Fort Worth is now closed, with all US-based employees working remotely or from coworking spaces.	<ul style="list-style-type: none">We contacted the landlord to enhance safety routines prior to the decision to close the office in Fort WorthWe have a lab in the US with safety routines in place

Social External Audit (e.g., SMETA) for the main manufacturer

0100%

Description	Results and findings	Actions taken
We asked our main manufacturer to undergo a Social External Audit (e.g., SMETA) to ensure that their processes aligned with our views and goals.	<ul style="list-style-type: none">Successfully assessed two out of four main manufacturers using SMETA audits to ensure standards of labor, health and safety, environmental performance, and ethics within the supplier sites	<ul style="list-style-type: none">Completed SMETA audit with independent (Sedex-approved) auditor for one manufacturer, received recently conducted and verified SMETA report for anotherConducted training on human rights and incident reporting for the main manufacturer during site visits.Implemented regular visits to our main manufacturers to monitor and ensure ongoing compliance.

Goals for next report (June 2025)

Update due diligence assessment

Description

Update and enhance the due diligence assessment process to better identify and mitigate risks across all supplier tiers, especially if medium and high risks are identified. Continue to map out additional 2nd and 3rd tiers from our important suppliers.

Ensure biennial visits to all main manufacturers by Airthings team

Description

Ensure that Airthings team members conduct visits to all main manufacturers at least once every two years to monitor compliance on ESG, SMETA corrective action plans, reinforce partnerships, and assess operational standards.

Reduce high-risk supplier proportion to below 5%

Description

Through enhanced due diligence and corrective action plans, reduce the proportion of suppliers classified as high-risk from 12% (June 2024) to below 5%. Currently, 88% of our suppliers are low to medium-low risk and require no further assessment, allowing us to focus on the remaining 12% that need additional scrutiny. Of these high and medium-risk suppliers/business partners, 61% have already signed our Code of Conduct.

Maintain training and compliance in Human Rights and ESG standards

Description

Maintain the current rate of 95% training compliance among all employees on human rights, diversity, and ESG standards.

Expand mapping of 3rd-tier suppliers and start their ESG assessment

Description

Extend comprehensive ESG mapping and assessments to cover important 3rd-tier suppliers in collaboration with our 2nd tiers, aiming for an increase in documented compliance and performance improvements across the entire supply chain.

Follow up on all SMETA corrective action plans from main manufacturers

Description

Systematically track and ensure the implementation of all corrective action plans arising from SMETA audits of main manufacturers to uphold continuous improvement in compliance standards.

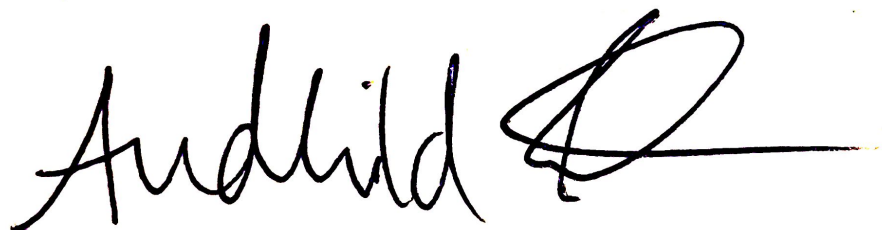
Conclusion

Over the course of the reporting period, Airthings has made significant strides in enhancing the transparency and ethical standards of its supply chain. Through rigorous SMETA audits and the diligent application of the Airthings Supplier Code of Conduct, the company has successfully assessed and improved transparency among its suppliers. Notably, these efforts have led to 100% of key suppliers being thoroughly evaluated through public documentation and direct questionnaires, ensuring that the vast majority are aligned with Airthings' commitment to ethical practices.

However, challenges remain, particularly with third-tier suppliers and in high-risk countries. These areas have proven complex due to resource constraints and the inherent difficulties of reaching deeper into the supply chain. Moving forward, Airthings plans to expand its assessment framework and refine its outreach strategies. This includes leveraging internal tools to more effectively evaluate supplier risk levels and conducting more frequent and targeted audits, particularly for those suppliers that still need to meet Airthings' rigorous standards.

As Airthings continues to navigate the complexities of global supply chain management, the focus remains firmly on upholding and advancing human rights and decent working conditions, environmental responsibility, and ethical business practices. The goal for the upcoming year is not only to address these challenges but to also ensure that most partners in the supply chain reflect Airthings' values and commitments. This ongoing effort will be crucial in sustaining Airthings' reputation as a leader in corporate responsibility and in making a positive impact on the global stage.

This Transparency Act Report 2024 from Airthings is read and accepted by:



Audhild Randa

COO - Transparency Officer

Date 7 June, 2024

Appendix: General transparency data

ESG Metric Our Governance Data (subtopics)	Material Topic (ESG Report)	Unit	2022	2023	Med -term Target (1-5years)
Trainings on Anti Bribery	Business Ethics	Number	99%	95%	>95% of FTE
Trainings on Human Rights	Business Ethics	Number	99%	95%	>95% of FTE
Manufacturing suppliers' trainings on ESG topics	Manufacturing and sourcing: human rights	Number of manufacturers	0	1	100%
Corruption or bribery cases reported	Manufacturing and sourcing: human rights	Number	none	none	None
Human rights violations cases reported	Manufacturing and sourcing: human rights	Number	none		None
Child or forced labour violations cases reported	Manufacturing and sourcing: human rights	Number	none	none	None
Total suppliers and business partners assessed	Manufacturing and sourcing: human rights	Number	211	214	100%
Intolerable	Manufacturing and sourcing: human rights	Number	-	0	0
High Risk	Manufacturing and sourcing: human rights	Number		6	0
Medium High Risk	Manufacturing and sourcing: human rights	Number	-	20	0
Medium Low Risk	Manufacturing and sourcing: human rights	Number	-	116	60%
Low Risk	Manufacturing and sourcing: human rights	Number	-	72	40%
N/A	Manufacturing and sourcing: human rights	Number	-	0	0
# Suppliers and business partners that needs to sign code of conduct (Mandatory)	Manufacturing and sourcing: human rights	Number	-	26	0%
Code of conduct signed	Manufacturing and sourcing: human rights	Number		17	45
# Suppliers and business partners missing for signing the code of conduct	Manufacturing and sourcing: human rights	Number	-	9	0
# Suppliers and business partners missing for answering suppliers questionnaires	Manufacturing and sourcing: human rights	Number	-	6	0
Suppliers and business partners with Environmental policy/Strategy	Manufacturing and sourcing: human rights	percentage	-	48%	>80%
Suppliers and business partners with Human Rights Policy/Strategy	Manufacturing and sourcing: human rights	percentage	-	48%	>80%
Suppliers and business partners with Data Privacy Policy	Manufacturing and sourcing: human rights	percentage	-	80%	>80%
Main Manufacturers	Manufacturing and sourcing: human rights	Number		4	-
Main Manufacturers who signed code of conduct	Manufacturing and sourcing: human rights	percentage	-	50%	100%

ESG Metric Our Governance Data (subtopics)	Material Topic (ESG Report)	Unit	2022	2023	Med -term Taget (1-5years)
Main anufacturers with SMETA or other 3rd party Social Audits	Manufacturing and sourcing: human rights	Number	-	2	4
Main manufacturers with ISO 14001	Manufacturing and sourcing: human rights	Number	-	4	4
% Suppliers and business partners missing for signing the code of conduct	Manufacturing and sourcing: human rights	percentage	-	35%	0%
% Suppliers and business partners signed the code of conduct	Manufacturing and sourcing: human rights	percentage	-	65%	100% of high risk
# Business partners being assessed	Manufacturing and sourcing: human rights	Number	-	169	all
Business partners signed code of conduct	Manufacturing and sourcing: human rights	Number	-	9	100% of high risk
Business partners missing to sign the code of conduct because of level of risk	Manufacturing and sourcing: human rights	Number	-	17	100%
# Total Suppliers being assessed	Manufacturing and sourcing: human rights	Number	-	45	all
Suppliers already signed code of conduct	Manufacturing and sourcing: human rights	Number	-	8	100% of high risk
Suppliers missing to sign the code of conduct because of level risk	Manufacturing and sourcing: human rights	Number		8	0
Trainings on Anti Bribery	Business Ethics	Number	99%	95%	>95% of FTE
Trainings on Human Rights	Business Ethics	Number	99%	95%	>95% of FTE
Manufacturing suppliers' trainings on ESG topics	Manufacturing and sourcing: human rights	Number of manufacturers	0	1	100%
Corruption or bribery cases reported	Manufacturing and sourcing: human rights	Number	none	none	None
Human rights violations cases reported	Manufacturing and sourcing: human rights	Number	none		None
Child or forced labour violations cases reported	Manufacturing and sourcing: human rights	Number	none	none	None



AIRTHINGS

Breathe better. Live better.