

Disruptive Technologies

Transparency Act Statement 2026

Public statement on due diligence for human rights and decent working conditions – fiscal year 2025

This statement describes how Disruptive Technologies works to identify, prevent and reduce adverse impacts on human rights and decent working conditions in our own operations and our supply chain, in accordance with the Norwegian Transparency Act (åpenhetsloven).

The nature and location of the business

Disruptive Technologies develops, produces and sells wireless IoT sensors. The Group consists of a parent company and 3 wholly owned subsidiaries:

Parent company:

Disruptive Technologies ASA

Subsidiaries:

- Disruptive Technologies Research AS
- Disruptive Technologies Inc.
- Disruptive Sensors Ltd

The production of Disruptive's products mainly takes place at the company's subcontractors in Norway and Germany. The group is headquartered in Lysaker, Norway where development work is carried out on existing and new products as well as sales, marketing and operational support functions. The subsidiaries in the US and United Kingdom mainly focus on sales, marketing, fulfillment and customer support.

Our guidelines and procedures for Human rights

We have a Code of Conduct for Suppliers and Business Partners (CoC) setting out our expectations on human rights, labour rights, anti-corruption, and health and safety. It prohibits child labour, forced labour and discrimination, and requires safe working conditions.

Our routines for following up and enforcing these commitments are still maturing. Strengthening supplier follow-up and formalising our due diligence process are priorities described below.

Our Human rights due diligence

We have assessed human rights risks across our supply chain, from raw materials through components to manufacturing and assembly, considering geographical and sector risk. As is typical for IoT hardware, the highest risk lies upstream rather than in our own operations or final assembly.

Highest level of risk identified:

1. Raw materials and mineral extraction
 - Labour conditions and health and safety in mining
 - Limited traceability deep in the supply chain
 - Risks associated with conflict minerals
2. Component manufacturing
 - Working hours, living wages and freedom of association, particularly in higher-risk geographies
 - Health and safety in factory environments
3. Final manufacturing and assembly
 - Low risk, as production takes place in Norway and Germany under strong labour standards

No actual adverse impacts were identified within our own operations during the reporting period. Potential risks remain higher up the value chain, where visibility is currently limited.

Actions and mitigations

Our work under the Transparency Act is at an early but active stage. We have a series of ongoing and planned activities:

- Transferring more of our component sourcing to trusted partners with more resources to do supplier audits and evaluations. Expected Result: Better audit coverage and visibility into upstream conditions.

- Rolling out our supplier Code of Conduct and obtaining formal acceptance, starting with our most significant suppliers. Expected Result: Documented supplier commitment to our human rights standards.
- Continue and improve the newly established Quarterly Compliance Review. Expected result: Earlier identification of emerging supplier risks.

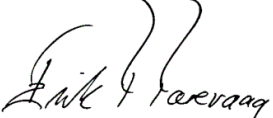
These measures aim to improve our view of supply chain risk and our follow-up of suppliers over time. Where risks are identified, we will take proportionate, preventive action. We will build on these steps in subsequent reporting periods.

For further questions about our human rights due diligence, please reach out to us at info@disruptive-technologies.com.

Signatures

Oslo, 2026-06-16

Signed by:  2F8A61F107294EB... Gunnar Robert Sellæg Chairman	Signed by:  C84743DA2695473... Merethe N. Jørgensen Boardmember	Signed by:  DF600B0F4EAF499... Richard Gregory Snyder Advisory Board Chair
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