

Samsung Electronics Nordic AB

# Norwegian Transparency Act: Due Diligence Report 2026

Period: 1 January 2025 - 31 December 2025

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# 1. Introduction

## 1.1. About this Report

This report has been prepared in accordance with Section 5 of the Transparency Act and summarizes the approach taken by Samsung Electronics Nordic AB to identify and assess actual and potential adverse impacts on human rights and decent working conditions in our own operations, supply chain or business partners. Samsung Electronics Nordic AB has published this report annually since 2023. This report covers the period from 1 January 2025 to 31 December 2025.

## 1.2. Company Overview

Samsung Electronics Co., Ltd. is a global technology company headquartered in South Korea. Unless specified, references in this statement to “Samsung”, “our”, “us”, or “we” refer to Samsung Electronics Co., Ltd. and its subsidiaries, Samsung Electronics Nordic AB in particular.

Samsung sets a high value on its people, technologies, products, and services in order to contribute to a better global society. We understand the importance of maintaining a sustainable and responsible supply chain and we commit to respecting the human rights and working conditions of every individual or group connected to our business.

Samsung’s five Business Principles serve as the embodiment of our determination to operate and hold ourselves to the highest standards of compliance with all applicable laws, our own company principles and our values. The five Business Principles are as follows:

1. We comply with laws and ethical standards;
2. We maintain a clean organisational culture;
3. We respect customers, shareholders, and employees;
4. We care about the environment, health, and safety; and
5. We are a socially responsible corporate citizen.

### Global business operations

As of the end of 2025, Samsung’s global business network consists of 221 operational facilities including 31 own production sites, 89 sales offices, 40 R&D centres, and 7 design centres in 76 countries worldwide and a workforce totalling 259,149 employees. We have 15 regional offices around the world, including our global headquarters in Korea, as well as in North America, Southeast Asia, Europe, Africa, and other regions. In 2025, Samsung reported a turnover of 2,226 billion NOK and invested 254,6 billion NOK in research and development.

Supporting our success as a global leader in the manufacture of electronic products, Samsung is reliant on a network of 2,503 first-tier suppliers. Our website includes our [Supplier List](#), which provides details of suppliers responsible for 80% of Samsung’s total transaction volume.

### Nordic business operations

In 1992, Samsung Electronics Nordic AB was established as a sales and marketing company for the Nordic market. It has 387 employees (2025) and is a wholly-owned subsidiary of Samsung Electronics Co. Ltd, South Korea and embedded in the global Samsung network.

Samsung Electronics Nordic conducts its operations through a limited company based in Kista, Sweden, and through branches in Norway (Samsung Electronics, Filial av Samsung Electronics Nordic AB), Finland (Samsung Electronics Nordic Aktiebolag, Suomen sivuliike), and Denmark (Samsung Electronics, Filial af Samsung Electronics Nordic AB). In Norway, Samsung’s presence consists of a sales and marketing branch of Samsung Electronics Nordic (i.e., Samsung Electronics, Filial av Samsung Electronics Nordic AB). Samsung Electronics

Nordic purchases all products from Samsung factories outside of the Nordics and ships them either to its central warehouse in the Netherlands, to Samsung Electronics Nordic's warehouses in Sweden, or directly to customers.

During the financial year ending 31 December 2025, Samsung Electronics Nordic AB principal activities in Norway were NACE code 46.180 Agents specialised in the sale of other particular products (Agenturhandel med spesialisert vareutvalg ellers).

More information on Samsung's business operations and human rights work can be found in the [global sustainability report](#) as well as on Samsung's [global sustainability website](#).

### 1.3. Global Key Activities 2025

#### Human rights training

- Samsung conducts annual human rights trainings to ensure that employees understand their rights and embed respect for human rights in all aspects of business activities.
- In 2025, 97.5% of all employees completed human rights training for general employees, with online and offline completion rates of 95.6% and 100%, respectively.

#### Grievance resolution

- In 2025, Samsung achieved a global grievance resolution rate of 99.8% with a total of 16,460 cases submitted.
- Samsung established our Global Grievance Resolution Policy in April 2024 and distributed guidelines to global business sites to ensure effective implementation in January 2025. Additionally, staff members dealing with grievances were put in place at several sales offices and research centers where grievance channels and governance structures were unclear.
- Employee satisfaction surveys regarding grievance resolutions was expanded in 2025 to include DX Division overseas sales sites and research centers (not only manufacturing sites)

#### Protecting the Right to an Adequate Standard of Living

- In 2025, we calculated the living wage for 139 worksites worldwide, including not only manufacturing sites but also sales sites and research centers. Additionally, Samsung participated in the RBA's Living Wage working group to learn about global discussions on legislation and standards as well as to study global best practices

#### Enhancing Occupational Health and Safety in the Workplace

- In April 2025, we established major industrial accident count and Lost Time Injuries Rate (LTIR) as key performance indicators (KPIs). We plan to systematically implement initiatives to achieve zero major industrial accidents and reach a global top-tier LTIR by 2030.
- Samsung Electronics operates a risk assessment expert training program to enhance the risk assessment capabilities of its employees. In 2025, we trained 3,039 risk assessment experts.

#### Supplier Due Diligence

- In accordance with RBA standards and our own guidelines, Samsung performed third-party audits for 122 first-tier and 39 second-tier suppliers in 2025.
- Samsung launched a new program in 2024, mandating high-risk first-tier suppliers to conduct on-site audits of their second-tier suppliers. To support this initiative, Samsung provided a dedicated inspection toolkit and training aligned with its audit standards, leading to over 400 second-tier suppliers being audited by first-tier suppliers in 2025.

## 2. Human Rights Framework

Samsung operate across vast geographies, including in locations where social, economic, and political factors may put human rights and decent working conditions at risk. We believe that respect for human rights is the best foundation to run our business and that it adds value to the Company. We are committed to making our best effort not to be complicit in or cause any human rights violations and to respect the human rights of every individual or group connected to our business with particular care for vulnerable and marginalized groups who may be impacted by our activities.

Samsung is committed to respecting the human rights and freedom of all. We strive to comply with the following international standards as well as, at a minimum, the laws of the countries in which we operate:

- International Bill of Human Rights (composed of the Universal Declaration of Human Rights the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social, and Cultural Rights);
- International Covenant on Civil and Political Rights;
- International Covenant on Economic, Social and Cultural Rights;
- ILO Declaration on Fundamental Principles and Rights at Work;
- United Nations Guiding Principles on Business and Human Rights;
- OECD Guidelines for Multinational Enterprises;
- Convention on the Rights of the Child;
- Convention on the Elimination of All Forms of Discrimination Against Women; and,
- Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children.



Our Human Rights Framework is based on the above outlined international standards and principles and consists of policies, due diligence, access to remedy, stakeholder engagement, transparency & reporting and governance, and it is the foundation of our approach to respect human rights and decent working conditions in our own operations as well as our supply chain and other business relationships.

### 2.1. Governance

We believe solid governance is essential to successfully embedding respect for human rights in our business operations. Our human rights governance is centered on the Board of Directors, Sustainability Committee, Sustainability Council, and the Supply Chain Sustainability Committee. This structure facilitates the supervision and management of human rights and working conditions across our business at various levels.

The Sustainability Committee under the Board of Directors supports the Board by closely monitoring relevant issues. The Committee determines priorities for sustainability strategies and incorporates human rights and other sustainability issues into the business decision-making process. The Sustainability Council, headed by the CEO, reviews and manages company-wide sustainability agenda with the leaders in charge of sustainability and in other teams at the headquarters as well as those from business divisions.

Lastly, the Supply Chain Sustainability Committee is a cross-functional collaborative body, consisting of the People Team, Partner Collaboration Center, Suwon Administration Center, Global Technology Research, Global CS Center, Global EHS Office, Global Legal Affairs, Investor Relations Team, and Corporate Sustainability Center. The Committee discusses and coordinates global labor and human rights issues across our business sites and supply chains to address and mitigate potential human rights risks.

Agenda items discussed at the Committee, depending on the saliency and urgency, are escalated to the Sustainability Council and the Sustainability Committee. Within the People Team, an executive with company-wide responsibilities for HR, labor relations, and human rights activities at our overseas business sites also leads the promotion of human rights initiatives across the company. The executive's performance evaluation and incentives are tied to the results of human rights due diligence conducted at our business sites.



Each department participating in the Supply Chain Sustainability Committee actively conducts human rights due diligence to identify, prevent, and mitigate actual or potential negative impacts on fundamental human rights and decent working conditions from our business operations. The Corporate Sustainability Center manages the overall sustainability agenda of Samsung Electronics and addresses human rights-related issues by collaborating closely with relevant organizational units such as the People Team, the Partner Collaboration Center, and Global Technology Research when necessary.

## 2.2. Policies

Samsung adheres to a comprehensive set of policies and standards that reflect our commitment to ethical business practices, human rights, decent working conditions and sustainability. These policies are aligned with international principles and frameworks, including the Responsible Business Alliance (RBA) Code of Conduct, which governs audits in our global factories and supply chain.

At the core of our human rights framework is the Global Human Rights Principles, which outlines our commitment to respecting internationally recognized human rights, extending to employees, business partners, and suppliers. Complementing these principles, our Supplier Code of Conduct and Guidelines enforce social, environmental, and ethical requirements for suppliers.

Our key global policies are located at [Samsung's global sustainability website](#) and include the following:

- Samsung Electronics Global Human Rights Principles
- Samsung Global Code of Conduct
- Business Conduct Guidelines
- Samsung Supplier Code of Conduct and Supplier Code of Conduct Guide
- Global Grievance Resolution Policy
- Child Labor Prohibition Policy
- Migrant Worker Policy
- Anti-Discrimination and Harassment Policy
- Student Worker Policy in China
- Guidelines for Apprenticeship in India

### Human rights training

Samsung conducts annual human rights trainings to ensure that employees understand their rights and embed respect for human rights in all aspects of business activities.

The company-wide human rights training covers understanding human rights, the corporate responsibilities to respect human rights, integrating the respect for human rights throughout business activities, employee rights in the workplace, and employee respect towards human rights. In manufacturing sites, mandatory human rights training for all employees includes both offline and online courses, with the offline sessions conducted in the local languages. In 2025, 97.5% of all employees completed the training for general employees, with online and offline completion rates of 95.6% and 100%, respectively.

Human rights training extends to employees in specific roles, including personnel, security, administration, and procurement teams, who work in areas closely associated with human rights related tasks. Notably, human rights training for procurement personnel is conducted annually considering the importance of supply chains. In 2025, tailored training for due diligence officers was introduced to address global due diligence requirements.

In addition, Samsung has designated approximately 70 staff in human resources, labor relations, and training roles at our global locations as 'Human Rights Champions' and conducts training to share the importance of corporate human rights respect and best practices. In 2025, the Human Rights Champion training invited ILO experts to cover topics such as the ILO Declaration on Fundamental Principles and Rights at Work and grievance policies.

In the Nordics, we conduct internal training sessions and have established comprehensive guidelines and policies that all employees must adhere to.

### 2.3. Due Diligence

Since 2023, Samsung hosts human rights stakeholder workshops at global, regional and local levels, bringing together experts from the International Labour Organization (ILO) and the UN Human Rights Office, as well as specialists from NGOs and global trade unions, to discuss our approach to human rights and decent working conditions due diligence and to understand risks and opportunities. We integrate the expert insights gathered during the meetings into our processes and report back to stakeholders about our follow-up.

Our Human Rights Risk Management System comprises five steps:

**Step 1: Identify risks for negative impact on human rights and decent working conditions**

Samsung systematically identifies and analyzes impacts on human rights and decent working conditions through a comprehensive approach that integrates multiple sources of information. This includes reviewing the due diligence results, NGO reports, media articles, stakeholder dialogues, organizational culture diagnosis results, and employee grievances. The process emphasizes understanding the impact on both the business and people, particularly focusing on vulnerable groups within the electronics industry, such as women, migrant workers, and minor workers.

Through this process, we identified 11 salient human rights risks, including working conditions, which were disclosed through the Samsung Electronics Global Human Rights Principles in February 2023. Samsung did not identify any actual adverse impacts on fundamental human rights and decent working conditions through its due diligence assessments in 2025.

**Step 2: Assess management priorities for identified salient risks for adverse impact on fundamental human rights and decent working conditions**

As a global company operating in approximately 70 countries, Samsung recognizes that managing human rights risks requires addressing the unique economic, political, and cultural contexts of each region. To achieve this, we conduct Human Rights Risk Assessments (HRRAs) on a regional basis, consolidating results from our subsidiaries across Europe, the Middle East, North America, Latin America, and Asia.

The HRRAs process begins with assessing salient human rights risks by each subsidiary, using our Human Rights Risk Assessment Criteria. These criteria evaluate the severity of risks and their likelihood of occurrence. Based

on these assessments, we generate a regional human rights risk heat map, categorizing each risk as high, medium, or low. Regional workshops are then conducted to discuss the heat map and ensure its appropriateness among subsidiaries.

As the final step of the HRRRA, we engage with external stakeholders, including experts from international organizations, NGOs and academia, to review and finalize the regional human rights risk heat map. We also gather feedback and discuss the measures to address human rights impacts in each region.

**Step 3: Develop response strategies to prevent, mitigate, and address the risk of adverse impacts on fundamental human rights and decent working conditions**

Building on the finalized regional human rights risk heat maps and stakeholder feedback, we developed targeted response strategies to prevent, mitigate, and address potential negative impacts on human rights and decent working conditions. These measures were distributed to all business sites across the five regions in December 2024. To ensure effective implementation of the response strategies, regional workshops were held in March 2025. During these workshops, best practices from business sites that successfully implemented the measures were shared, while challenges encountered during implementation were discussed. The workshops supported each site in diligently carrying out its human rights risk management plans.

In Q3 2025, due diligence checklists were created and distributed to further enhance the implementation of regional human rights risk management plans. These checklists enable each site to systematically prepare for due diligence, with self-inspections conducted to ensure compliance and continuous improvement.

**Step 4: Implementation of plans and effectiveness tracking**

Samsung Electronics strives to build systems that enable all business sites to manage risks of adverse impacts on human rights and decent working conditions and monitor the effectiveness of the measures taken. These includes:

- **Business & Human Rights Benchmark (BHRB) System:** In 2023, we upgraded our monitoring system to the BHRB, which evaluates labor rights, organizational culture, working environment, and diversity, equity, and inclusion across 33 items and 132 indicators. Manufacturing sites conduct annual self-evaluations, and follow-up assessments are conducted for areas requiring improvement. Pilot assessments were conducted for 47 overseas sites in 2025, with plans to further refine practices based on results.
- **Simplified Human Rights Impact Assessment (sHRIA):** Our internal experts conduct sHRIA to identify and address human rights risks, focusing on vulnerable groups such as women, migrant workers, and minors. Assessments include interviews with stakeholders and evaluate potential impacts, ensuring measures are developed and tracked for implementation.
- **Topic-specific audits:** We conduct targeted audits for vulnerable groups, including annual migrant worker audits at sites employing migrant workers using RBA audit standards to ensure compliance with policies.
- **RBA third-party audits:** As an RBA member, we are committed to implementing the RBA Code of Conduct. Every year, we complete the Self-Assessment Questionnaire (SAQ) at our manufacturing sites. Additionally, every manufacturing site is audited at least every two years, not just those designated as high-risk. These audits follow the RBA's Validated Assessment Program (VAP) or Auditee Managed Program protocols. If non-conformities are identified, a Corrective Action Plan (CAP) is developed to prevent recurrences. The CAP must be reviewed and approved by audit experts before implementation within the RBA's specified timeframe. Certified auditors from RBA-approved firms conduct face-to-face interviews in workers' preferred languages to gather direct insights into their experiences.
- **Supplier audits:** We conduct third-party audits every three years on the top 90% of our suppliers, selected based on annual transaction amounts, and additional high-risk suppliers. Initial audits are conducted by RBA certified third-party audit firms, in accordance with Samsung's Supplier Code of

Conduct and based on RBA criteria and processes. Any improvements that can be made immediately after initial audits are corrected on site, and the implementation of improvements is confirmed through closure audits.

- Effectiveness tracking: We monitor the effectiveness of human rights measures through employee surveys, work-hour analysis, and grievance mechanism assessments. Anti-discrimination efforts are evaluated via organizational culture surveys, while working conditions are assessed through wage analysis and work-hour monitoring.

#### Step 5: Grievance resolution and provision of effective remedies

As the final step in our Human Rights Risk Management Process, Samsung is committed to ensuring effective remedies where our operations may have caused or contributed to adverse impacts on human rights or decent working conditions for individuals or groups. Recognizing that accountability and redress are critical to upholding human rights and decent working conditions, we have established robust mechanisms to address grievances and provide fair resolutions.

## 2.4. Access to Remedy

We remain committed to ensuring access to remedy for those affected by our business activities. All complaints or grievances filed by individuals or groups adversely affected by our operations are promptly investigated to deliver effective resolutions. We prioritize transparency and accountability in our processes, ensuring that remedies are implemented fairly and in a timely manner.

#### Grievance resolution process

Samsung strengthened its commitment to providing access to remedy by establishing the Global Grievance Resolution Policy in April 2024. Guidelines for effective implementation were developed and distributed to all subsidiaries, with dedicated grievance resolution personnel appointed in January 2025 to address governance gaps. Global training was provided to ensure alignment with the UN Guiding Principles on Business and Human Rights.

Complainants may report grievances anonymously or identified, with confidentiality and protection against retaliation guaranteed. Grievances are assigned to relevant organizational units, with higher-priority cases addressed urgently to prevent irremediable harm. The process includes four steps – receipt, investigation, notification, and resolution – and aims to close cases within three months, though timelines may vary based on complexity.

Samsung also expects its suppliers to provide access to remedy to rightsholders where harm has occurred, as outlined in our Supplier Code of Conduct and Global Grievance Resolution Policy. We support suppliers in establishing and operating internal grievance handling systems to facilitate communication between executive management and employees. Additionally, Samsung promotes external stakeholder engagement through a global communication address ([sustainability.sec@samsung.com](mailto:sustainability.sec@samsung.com)) and continuously evaluates and improves its grievance procedures for accessibility and effectiveness.

In 2025, Samsung achieved a global grievance resolution rate of 99.8% with a total of 16,460 cases submitted. Aggregated grievance data, remedies provided, and preventive actions are disclosed in [Samsung's global sustainability report](#).

#### Local grievance systems

In addition to the existing global grievance system, Samsung Nordic has local grievance policies in place that align with the Global Grievance Resolution Policy. A third-party whistleblowing system operates in Sweden, Denmark, Norway, and Finland, ensuring compliance with European and Nordic regulations. This system allows

employees to report serious concerns securely and confidentially. Employees can also raise complaints and concerns in the workplace with their manager, a Head of Division, or the HR/Legal team.

In 2025, four grievances were reported to Samsung Nordic. These issues were investigated in accordance with our policies and grievance processes, with findings communicated to the parties involved. No grievances regarding human rights or working conditions were reported.

## 2.5. Transparency & Reporting

We publicly disclose our activities to respect human rights on our global website, informed by the UN Guiding Principles on Business and Human Rights. In addition, when making such disclosures, we consider the Corporate Human Rights Benchmark (CHRB), which measures the human rights approach of global companies. We also take into account the requirements of Know the Chain (KTC), which focuses on activities to prevent forced labor in the supply chain.

In addition to the Norwegian Transparency Act Report, Samsung publishes disclosures in line with the UK Modern Slavery Act, the Australian Modern Slavery Act, and the Canadian Forced and Child Labour Act. We also publish an annual Responsible Minerals Report that sets expectations for our suppliers and their subcontractors on responsible minerals management. Further information can be found in [Samsung Electronics' Responsible Minerals Report](#).

All relevant reports are published publicly on our global [sustainability website](#).

## 2.6. Stakeholder Engagement

Stakeholder engagement is one of the core pillars of Samsung's Labor and Human Rights Framework and an important element of our human rights and decent working conditions' due diligence process. As part of our ongoing efforts to uphold human rights and decent working conditions, we strive to engage in open, active, and direct communication with our stakeholders. As a part of the ICT industry ecosystem, Samsung acknowledges that its business activities may impact workers and communities within value chains. We engage in dialogue with various stakeholders, including all rights holders and those potentially affected by our operations. We listen to their perspectives, draw insights from them, and incorporate these findings into our management activities.

Our stakeholder engagement activities are diverse, ranging from informal dialogue to strategic partnerships. Our stakeholders include our employees, business associations and industry initiatives, civil society organizations, intergovernmental organizations, benchmarking agencies, human rights experts and consultancies, customers, suppliers, investors, and governments.

In support of our human rights and decent working conditions due diligence process, we engage in global initiatives and partnerships to collaborate with industry partners, external stakeholders and peers on addressing supply chain risks including conflict and other minerals and to amplify the benefits of sustainable supply chains around the world. We also actively engage other companies and the relevant stakeholders in the industry to promote responsible sourcing of minerals through initiatives such as the Responsible Business Alliance (RBA), RBA Responsible Minerals Initiative (RMI), and the European Partnership for Responsible Minerals (EPRM).

### Labor and human rights stakeholder workshop

In September 2025, we held our third Labor and Human Rights Stakeholder Workshop in Frankfurt, Germany. At this event, we shared our global and regional efforts to respect labor and human rights while seeking external perspectives. The dialogue with external stakeholders allowed us to capture their valuable insights on global labor and human rights trends, develop a clear understanding of their expectations for corporations, and receive advice on how to best meet those expectations. During the workshop, we presented specific case

studies on human rights initiatives from our German sales subsidiary and Polish research center. DS Division's German subsidiary also attended the event and shared case studies on their own human rights practices.

#### Engagement with local stakeholders

In 2025, we implemented engagement initiatives to gather feedback from local stakeholders regarding the regional impacts of our manufacturing sites. These stakeholder dialogues included participation from regional offices of international organizations, local labor unions, civil society organizations, and local government agencies. After carefully listening to stakeholder feedback, each site reviewed actionable measures to mitigate the impacts of its local operations.

Period	Region	Format
March 2025	Latin America	Online
April 2025	Europe, Middle East, North Africa	In-person in Geneva
July-August 2025	Brazil, Egypt, Türkiye, Mexico, China	Online

### 3. Salient Risks of Adverse Impacts on Fundamental Human Rights and Decent Working Conditions and Responses

#### 3.1. Our Salient Risks of Adverse Impacts on Fundamental Human Rights and Decent Working Conditions and Responses

The risks identified through our due diligence processes span a wide range of critical areas, including working conditions, forced and child labor, freedom of association, health and safety, non-discrimination, anti-harassment, product and digital responsibility, environmental sustainability, supplier accountability, and responsible minerals sourcing. Samsung addresses these risks through tailored measures, including compliance with local laws and ILO conventions, fostering safe workplaces, promoting inclusivity, ensuring ethical practices in product development and digital operations, mitigating environmental impacts, and enforcing ethical standards across its supply chain. These activities are outlined in detail in the following table.

Salient risks of adverse impacts on fundamental human rights and decent working conditions	Organizational units in charge	Affected stakeholders	Activities to prevent, mitigate, or address risks of adverse impacts
Working hours and adequate standards of living	<ul style="list-style-type: none"> <li>• People Team</li> <li>• Partner Collaboration Center</li> </ul>	<ul style="list-style-type: none"> <li>• Our employees</li> <li>• Workers in our supply chains</li> </ul>	<ul style="list-style-type: none"> <li>• Internal monitoring and third-party audits</li> <li>• Industry network engagement</li> </ul> <p>Working hours:</p> <ul style="list-style-type: none"> <li>• Pre-building of new products prior to their official release</li> <li>• Regular review of working hours at our production sites and suppliers</li> <li>• Identifying subsidiaries with an elevated risk of overtime violations, establishing remedial plans, and conducting monthly monitoring of their execution</li> <li>• Obtaining consent from production line workers for overtime</li> </ul> <p>Standard of living:</p> <ul style="list-style-type: none"> <li>• Calculating living wages across 139 regions where our manufacturing sites, sales sites, and research centers are located, utilizing the Anker Methodology</li> <li>• Recommending the establishment of corrective action plans for sites paying below the living wage</li> </ul>
Forced labor and child labor	<ul style="list-style-type: none"> <li>• People Team</li> <li>• Partner Collaboration Centre</li> </ul>	<ul style="list-style-type: none"> <li>• Our employees</li> <li>• Workers in our supply chains</li> </ul>	<ul style="list-style-type: none"> <li>• Internal monitoring, including of government and NGO reports, and third-party audits</li> <li>• Participating in the ILO Child Labour Platform</li> </ul> <p>Forced labor:</p> <ul style="list-style-type: none"> <li>• Developing tailored assessment tools for manufacturing sites employing foreign migrant workers</li> </ul>

			<ul style="list-style-type: none"> <li>• Conducting on-site audits of production facilities and employee dormitories</li> <li>• Conducting face-to-face interviews with foreign migrant workers on their working and living conditions</li> <li>• Conducting specialized audits of forced labor of migrant workers employed by our suppliers</li> </ul> <p>Child labor:</p> <ul style="list-style-type: none"> <li>• Employment management system</li> <li>• Age verification process</li> <li>• Implementing capacity-building and training programs</li> <li>• Conducting special audits of child labor around school vacation periods</li> </ul>
Freedom of association and collective bargaining	<ul style="list-style-type: none"> <li>• People Team</li> <li>• Partner Collaboration Centre</li> <li>• Global Technology Research</li> <li>• Vendor Management Improvement T/F</li> </ul>	<ul style="list-style-type: none"> <li>• Our employees</li> <li>• Workers in our supply chains</li> </ul>	<ul style="list-style-type: none"> <li>• Internal and third-party audits</li> <li>• Reinforcement of relevant articles in our Code of Conduct</li> <li>• Operating Employee Relations Advisory Group under the Board of Directors</li> <li>• Implementing capacity-building and training programs</li> <li>• Dialogues and collaboration with employee representative bodies, including labor unions and works councils</li> </ul>
Occupational health and safety	<ul style="list-style-type: none"> <li>• Global EHS Centre</li> <li>• Partner Collaboration Centre</li> </ul>	<ul style="list-style-type: none"> <li>• Our employees</li> <li>• Workers in our supply chains</li> </ul>	<ul style="list-style-type: none"> <li>• Internal and third-party monitoring</li> <li>• Acquiring and retaining internationally recognized EHS certifications at all of our business sites</li> <li>• Establishing a monitoring system for all of our global production sites</li> <li>• Development and adoption of new protective gear</li> <li>• Safety capacity-building and training, and fostering experts</li> </ul>
Non-discrimination & diversity and inclusion	<ul style="list-style-type: none"> <li>• People Team</li> <li>• Partner Collaboration Centre</li> </ul>	<ul style="list-style-type: none"> <li>• Our employees</li> <li>• Workers in our supply chains</li> <li>• End users, Consumers</li> <li>• Local communities, Society</li> </ul>	<ul style="list-style-type: none"> <li>• Internal and third-party audits</li> <li>• Internal DEI network</li> <li>• Implementing capacity-building and training programs</li> <li>• Annual employee surveys (Samsung Culture Index)</li> <li>• Industry network engagement</li> <li>• Joining the Valuable 500</li> </ul>
Anti-harassment	<ul style="list-style-type: none"> <li>• People Team</li> <li>• Partner Collaboration Centre</li> </ul>	<ul style="list-style-type: none"> <li>• Our employees</li> <li>• Workers in our supply chains</li> </ul>	<ul style="list-style-type: none"> <li>• Internal and third-party audits</li> <li>• Implementing capacity-building and training programs</li> <li>• Annual employee surveys (Samsung Culture Index)</li> <li>• Anti-Discrimination and Harassment Policy</li> <li>• Anti-harassment guidelines</li> </ul>

			<ul style="list-style-type: none"> <li>• Developing equality self-assessment toolkit and self-assessments at 20 manufacturing sites</li> <li>• Developed and distributed the Essential Guide to Gender Equality</li> <li>• DEI language guide</li> </ul>
Product responsibility including AI ethics	<ul style="list-style-type: none"> <li>• Samsung Research</li> <li>• Corporate Sustainability Centre</li> <li>• R&amp;D Teams at each business unit</li> </ul>	<ul style="list-style-type: none"> <li>• End users, Consumers</li> </ul>	<ul style="list-style-type: none"> <li>• AI Ethics Principles of fairness, transparency, and accountability</li> <li>• Guidelines on AI Ethics</li> <li>• Provision of AI models and data card templates</li> <li>• Online training</li> </ul>
Digital responsibility including privacy and freedom of expression	<ul style="list-style-type: none"> <li>• Information Security Centre</li> <li>• Global Privacy Office</li> <li>• Communications Team</li> <li>• Partner Collaboration Centre</li> </ul>	<ul style="list-style-type: none"> <li>• Our employees</li> <li>• Workers in our supply chains</li> <li>• End users, Consumers</li> <li>• Local communities, Society</li> </ul>	<ul style="list-style-type: none"> <li>• Providing products and services in compliance with Samsung Privacy Protection Principles including transparency, security, and choice</li> <li>• Enabling freedom of expression in products and services</li> </ul>
Environmental responsibility	<ul style="list-style-type: none"> <li>• Global EHS Centre</li> <li>• Partner Collaboration Centre</li> <li>• Corporate Sustainability Centre</li> </ul>	<ul style="list-style-type: none"> <li>• Our employees</li> <li>• Workers in our supply chains</li> <li>• End users, Consumers</li> <li>• Local communities, Society</li> </ul>	<ul style="list-style-type: none"> <li>• Announcement of the New Environmental Strategy incorporating emissions reduction, new sustainability practices, and innovative technologies and products</li> <li>• Acquiring and maintaining international certifications on environmental and energy management</li> </ul>
Supplier responsibility	<ul style="list-style-type: none"> <li>• Partner Collaboration Centre</li> <li>• Purchase Teams</li> <li>• Global EHS Office</li> </ul>	<ul style="list-style-type: none"> <li>• Workers in our supply chains</li> </ul>	<ul style="list-style-type: none"> <li>• Responsible purchasing practice requirements in contracts and evaluations of suppliers</li> <li>• Conducting self-assessments and third-party audits</li> <li>• Regular verification of supplier data</li> <li>• Capacity-building and training</li> <li>• Monitoring the status of remedy for victims of human rights violations at first-tier suppliers</li> <li>• Research on suppliers' recruitment agencies in sending and receiving countries</li> </ul>
Responsible minerals sourcing	<ul style="list-style-type: none"> <li>• Partner Collaboration Centre</li> <li>• Purchase Teams</li> <li>• Corporate Sustainability Centre</li> </ul>	<ul style="list-style-type: none"> <li>• Workers in our supply chains</li> <li>• Local communities, Society</li> </ul>	<ul style="list-style-type: none"> <li>• Implementing capacity-building and training programs</li> <li>• Industry network engagement</li> <li>• Monitoring data on conflict minerals and high-risk minerals used by first-tier suppliers and smelters</li> <li>• Conducting on-site audits at first-tier suppliers</li> <li>• Requesting a ban on transactions with suppliers using uncertified smelters</li> </ul>

Samsung Electronics has set a medium to long-term goal of improving its due diligence compliance rate at its business sites with regard to business and human rights. The compliance rate is calculated as the average of Validated Assessment Program (VAP) compliance rate across all production sites that were subject to due diligence at the baseline and in the previous year, considering the due diligence cycle. VAP is a standardized framework for evaluating the social and environmental performance of factories, introduced by the Responsible Business Alliance.

To achieve this goal, the company will implement a comprehensive approach, including conducting various self-assessments such as simplified human rights impact assessments, which will actively engage vulnerable stakeholders. These efforts are structured around specific milestones:

(1) 2025: Achieve a 90% compliance rate in human rights due diligence, with six simplified human rights and decent working conditions impact assessments conducted.

(2) 2027: Achieve a 92% compliance rate in human rights due diligence, with a cumulative total of 10 simplified human rights and decent working conditions impact assessments completed.

(3) 2030: Achieve a 95% compliance rate in human rights due diligence, with a cumulative total of 15 simplified human rights and decent working conditions impact assessments conducted.

#### Third-party audits on suppliers

Among suppliers that supply parts to Samsung Electronics' manufacturing sites, the company conducts third-party audits annually on the top 90% of suppliers (renewed every three years), selected based on annual transaction amounts, as well as a portion of high-risk suppliers (implemented immediately upon identifying significant actual or potential impacts). These audits are carried out in accordance with Samsung Electronics' Supplier Code of Conduct, which is aligned with the criteria and processes established by the Responsible Business Alliance (RBA).

The audit process includes:

- Document Review: Analysis of employee salary information, contracts, policies, and other relevant documentation.
- Interviews: Conducted with workers and managers, exceeding the square root of the total employee count.
- On-Site Audits: Initial and closure audits to assess compliance and identify areas for improvement.
- Improvement Measures: Implementation of corrective actions and follow-up evaluations.

## 4. Right to information

Under the Norwegian Transparency Act (NTA) anyone has the right to inquire access to information on how a business in scope of the law addresses human and labor rights risks in its own business.y. This includes the general public including private individuals, businesses and journalists.

In line with the NTA, Samsung will respond to any information request being made within 3 weeks upon receiving. In some cases, there may be grounds for a postponed deadline, in which case the person inquiring will get information about why and when they can expect an answer. In certain situations, enterprises may reject the information requirement, but this must be justified. If the information requirement is rejected, a more detailed explanation can be requested within three weeks.

Any request for information as outlined above shall be sent to: [nta@samsung.se](mailto:nta@samsung.se).

## 5. Approval and Publication

This report has been approved by the Board of Directors and the President of Samsung Electronics Nordic AB.

The report is published annually in June.

# Signature Certificate

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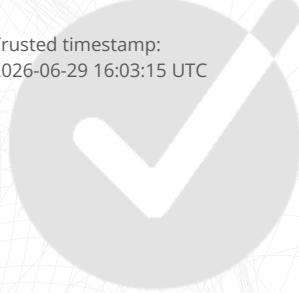

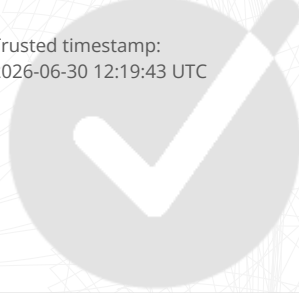

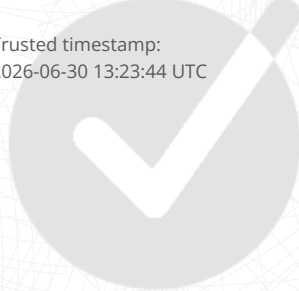
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## Signatories

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 <p><b>Won Gun Hwang</b> Head of CE Division <b>Samsung Electronics Nordic AB</b> Email: wg.hwang@samsung.com Device: Edge 149.0.0.0 on Unknown Windows 10.0 (desktop) IP number: 147.161.189.107</p>	 <p>Trusted timestamp: 2026-06-30 12:19:43 UTC</p>
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## Supplemental files

<p><b>Knox Approval - NTA report 2026</b> File <a href="#">Knox Approval - NTA report 2026.pdf</a> Secure link <a href="https://app.getaccept.com/v/www9u9jdgjj/82xq4xxuqwqy57/attachment/64k4dagy2ewd">https://app.getaccept.com/v/www9u9jdgjj/82xq4xxuqwqy57/attachment/64k4dagy2ewd</a> <small>File fingerprint b719373637a28ef07c0faaff805148c992ce723b59d69ac2bfc188068dc9686b6f5a8b8fa5c7cee976696b6e0bddf61bb9d03fe990632de6f679a36f243fb3</small></p>
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