

DUE DILIGENCE ASSESSMENT 2025

according to the Norwegian Transparency Act

ELTEK NORWAY AS

Background

The Norwegian Transparency Act requires companies to carry out due diligence to identify, prevent, mitigate, and account for adverse impacts on human rights and decent working conditions.

Eltek Norway AS ("Eltek Norway" or "the Company") is committed to responsible business conduct and transparency across its operations and supply chain. This report covers the period 1 January to 31 December 2025 and provides an overview of the Company's due diligence processes, identified risks, measures implemented, and planned improvements.

Eltek Norway aligns its due diligence approach with the OECD Due Diligence Guidance for Responsible Business Conduct. The Company is also preparing for upcoming regulatory requirements, including the Corporate Sustainability Due Diligence Directive (CSDDD) and participation in Corporate Sustainability Reporting Directive (CSRD) reporting from the financial year 2028.

About the Company

Eltek Norway AS is part of Delta Group; a global provider of power and thermal management solutions headquartered in Taiwan. The Company operates from Drammen, Norway, and is fully owned by Delta International Holding Limited B.V.

Delta Group adheres to internationally recognized standards for responsible business conduct, including:

- UN Global Compact
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- Responsible Business Alliance (RBA) Code of Conduct

Anchoring Accountability

Responsibility for due diligence activities is anchored at both Board and management level.

In 2025, Eltek Norway has strengthened governance structures by:

- Integrating due diligence follow-up into relevant management processes
- Further clarifying roles and responsibilities across ESG, procurement, and quality functions
- Maintaining established procedures for escalation and handling of potential concerns related to human rights and working conditions

Due Diligence in the Supply Chain

Eltek Norway applies a risk-based approach to its due diligence assessments, focusing on areas with the highest potential adverse impact.

The Company evaluates its supplier base using internationally recognized sources and indices relating to:

- Human rights
- Labour conditions
- Environmental performance
- Governance and corruption risk

Use of Risk Assessment Tools

Eltek Norway has strengthened its methodology through the implementation of Protенcon as a supporting tool for supply chain risk assessment. This tool contributes to a more structured and data-informed approach to identifying and prioritizing risks related to human rights, labour conditions, and governance across the supplier base.

Eltek Norway acknowledges that, due to the complexity of global, multi-tier supply chains, no single tool provides full visibility. Protенcon is therefore used in combination with established internal processes and group-level assessments.

Results of Assessments

Eltek Norway operates within a global and complex supply chain and continues to focus on product and material categories associated with elevated risk, including:

- Conflict minerals
- Metals such as steel, copper, and aluminium
- Electronic components
- Batteries

Key risk areas identified remain consistent with previous years and include:

- Working conditions in upstream supply chains
- Limited visibility beyond Tier 1 suppliers
- Variations in labour standards and enforcement across regions

No confirmed breaches of human rights have been identified through Eltek Norway's own due diligence processes during the reporting period.

Status and Progress in 2025

During 2025, Eltek Norway continued to develop its due diligence practices through:

- Awareness initiatives on human rights and the Transparency Act
- Further integration of human rights criteria into supplier evaluation processes
- Increased use of Delta Group's supplier evaluation systems and ESG tools

The Company has also strengthened internal follow-up mechanisms and improved visibility of supplier-related risks.

Risk Identification

In early 2026, Eltek Norway was contacted by a customer regarding a publicly reported incident at a Delta manufacturing facility in Thailand in 2024. The matter concerned the death of a contract worker who collapsed at the workplace after returning from medical treatment. The incident received attention from local media and was subsequently raised by European customers.

Eltek Norway engaged with the relevant manufacturing entity to obtain further information. According to the information received:

- External reviews of procedures and documentation were conducted
- Local authorities concluded that applicable procedures and legal requirements had been followed
- Additional independent reviews were initiated to further assess and strengthen internal practices

This case illustrates the complexity of assessing working conditions across global supply chains, where local economic conditions, labour market structures, and awareness of labour rights may influence how working conditions are perceived and experienced.

At the same time, Eltek Norway recognizes the responsibility associated with global sourcing and the importance of continuous improvement in safeguarding human rights and working conditions.

Social audit through JAC (Joint Alliance for CSR)

Following the incident and increased customer attention, a JAC social audit was conducted at Delta Electronics (Thailand) PCL (Plant 5) in April 2026.

The audit identified a limited number of non-conformities primarily related to management systems and implementation practices. The findings are consistent with key risk areas previously identified by Eltek Norway, including:

- Working conditions
- Effectiveness of management systems
- Monitoring of subcontractors and service providers

Corrective action plans have been established with defined responsibilities and timelines extending into 2026 and 2027.

Follow-up Actions in 2026

Based on prior assessments and audit findings, Eltek Norway, in collaboration with relevant Delta manufacturing entities, has identified areas where further follow-up and improvement is required.

These include cross-regional communication and escalation processes, monitoring of subcontracted labor and service providers, follow-up of working hour practices and workforce dialogue mechanisms, as well as the implementation of procedures in practice.

These areas reflect previously identified risk topics and are considered relevant for continued due diligence efforts.

Measures and Priorities Going Forward

Eltek Norway will continue to strengthen its due diligence framework through the following key measures:

- Supplier monitoring: Enhanced follow-up of high-risk suppliers, including subcontractors and service providers, and continued support for corrective actions
- Human rights integration: Further integration of human rights considerations into procurement processes and continued development of the Supplier Code of Conduct
- Governance and communication: Strengthened cross-regional coordination and continued cooperation with Delta Corporate
- Regulatory alignment: Ongoing preparation for CSDDD and contribution to CSRD implementation from FY2028
- Capability building: Continued training activities and strengthened internal ownership of due diligence processes

Reporting and Transparency

Eltek Norway publishes its due diligence statement annually in accordance with the Norwegian Transparency Act. ESG reporting is managed at Delta Group level, while financial reporting is handled at the legal entity level. The Company continues to develop reporting channels, including whistleblowing mechanisms for the EMEA region.

Conclusion

Eltek Norway AS continues to strengthen its due diligence processes in line with regulatory requirements and stakeholder expectations.

The 2025 reporting period reflects a continued transition towards a more structured, risk-based, and transparent approach, with increased focus on:

- Implementation of policies in practice
- Monitoring and follow-up of suppliers
- Managing risks in complex, global supply chains

While no confirmed breaches of human rights have been identified through the Company's own processes, the need for continuous improvement remains.

This statement has been approved by the Board of Directors of Eltek Norway AS.

Eltek Norway AS

Drammen, 30th of June 2026

Peter Herbert Hofstetter
Managing Director

Kelvin Yen-Wen Huang
Chairman of the Board

Dalip Kumar Sharma
Board Member

Chiu-Hua Hao
Board Member

Hilde Steira
Board Member

Aina Therese Erstad
Board Member

Appendix – Relevant Policies and Documents

Eltek Norway's due diligence work is supported by Delta Group policies and internal governance documents, including but not limited to:

- Delta Supplier Code of Conduct
- Delta Corporate Social Responsibility Principles
- Delta Group Human Rights and Employment Policy
- Delta Conflict Minerals Policy
- Delta Group Non-Discrimination and Anti-Harassment Policy
- Delta Group Environmental, Health and Safety Policies
- Delta Group ESG Report 2024
- Delta Electronics CSRD Sustainability Report 2024
- Delta Product Carbon Footprint strategy
- Eltek Norway AS risk assessment related to the Transparency Act

These documents form the basis for Eltek Norway's approach to responsible business conduct and are applied across relevant operations and supply chain activities.