

FELL TECH SUSTAINABILITY STRATEGY



1. Introduction

Fell Technology AS (“Fell Tech”) is pioneering environmental stewardship, social responsibility, and ethical governance. We believe that our commitment to unyielding integrity and high standards of business conduct is integral to creating a sustainable future. This commitment extends to all aspects of our operations, including our relationships with suppliers, contractors, consortium partners, and consultants (collectively “Suppliers”). Fell Tech's Supplier relationships are founded on lawful, efficient, and fair practices, and we require our Suppliers to adhere to all applicable legal and regulatory requirements.

We recognize the urgent need for sustainable solutions to today's most pressing challenges. Our commitment to environmental stewardship, social responsibility, and ethical governance is central to our identity as a company and informs the development of our cutting-edge products and services. This document outlines our sustainability strategy, detailing how we integrate the United Nations' 17 Sustainable Development Goals (SDGs) into our core business operations and product offerings, ultimately working

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towards a more sustainable future for all.

Our Sustainability Strategy not only focuses on the innovative solutions we provide but also on the responsible business practices we uphold, as outlined in the Fell Tech Integrity Guide for Suppliers, Contractors, and Consultants (the “Supplier Ethics Guide”). This Guide serves as a reference for all Suppliers and their employees, workers, representatives, suppliers, and subcontractors, ensuring that they meet the high standards of conduct and ethical behavior we expect in connection with their activities for Fell Tech.

We understand that our actions have a significant impact on the world around us, and we are committed to integrating sustainability into the DNA of our business operations and product offerings. By optimizing energy usage, propelling industry evolution, driving technological innovation, and fostering sustainable homes, buildings, and energy grids, we actively contribute to a greener and more sustainable future for all.

Suppliers are responsible for ensuring that they and their affiliates comply with the standards of conduct set out in the Supplier Ethics Guide and in other contractual obligations to Fell Tech. We encourage open communication and invite suppliers to contact the Fell Tech manager they work with or any Fell Tech purchaser if they have any questions about the Supplier Ethics Guide or the standards of business conduct that all Fell Tech Suppliers must meet.

By incorporating our commitment to sustainability into every aspect of our business, we aim to create a better and more sustainable future for all. As we continue to develop state-of-the-art solutions that transform the technicalities of smart energy and home management, we remain dedicated to upholding the highest standards of ethical conduct, ensuring that our work aligns with the United Nations' Sustainable Development Goals and our own core values. Together, we can shape a future where technology and sustainability go hand in hand.

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2. 10 Principles for Sustainability

To ensure that our commitment to sustainability is effectively integrated into our business operations, we have developed the following 10 principles to guide our work:

1. Ensure high-quality sustainability efforts: We strive for excellence in all aspects of our sustainability work, incorporating best practices and continuously improving our approach to addressing environmental, social, and governance challenges.
2. Comply with laws and regulations: We work systematically to ensure compliance with all relevant laws and regulations, establishing robust internal controls and monitoring processes to mitigate risk and promote ethical business practices.
3. Engage the entire organization: Our sustainability efforts encompass the entire organization, and we are committed to providing all employees with the necessary knowledge and resources to contribute to our sustainability goals.
4. Integrate sustainability into management and governance systems: We make sustainability an integral part of our management and governance systems, ensuring that it is consistently embedded in decision-making processes at all levels of the organization.
5. Maintain open dialogue with stakeholders: We actively engage with our stakeholders, including customers, suppliers, local communities, and other relevant parties, to ensure that our sustainability efforts remain relevant and important to them.
6. Monitor and track key sustainability activities: We systematically monitor and track our sustainability activities, measuring progress against established targets and identifying areas for improvement.
7. Be transparent about our sustainability efforts: We are committed to being open and transparent about our sustainability work, regularly reporting on our progress and sharing our successes and challenges with stakeholders.
8. Continuously improve our sustainability performance: We strive for continuous improvement in our sustainability performance, regularly reviewing and updating our strategies, targets, and methods to ensure we remain at the forefront of sustainable business practices.
9. Contribute to value creation and reduced financial risk: Through our sustainability efforts, we aim to create long-term value for our stakeholders and reduce financial risks associated with environmental, social, and governance issues.
10. Practice sustainable operations and property management: We are dedicated to sustainable operations and property management, working to reduce the environmental impact of our facilities and develop properties in a more sustainable direction.

By embedding these principles into our core values and business operations, we will continue to drive positive change and contribute to the global effort to achieve the United Nations' Sustainable Development Goals.

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3. Stakeholders

It is essential to identify and understand the key stakeholders that have an impact on or are impacted by our operations. Below is a stakeholder analysis that outlines these key stakeholders and their respective interests in our business:

Stakeholder	Interest	Influence
Customers	High-quality, sustainable products and services, affordable pricing, and excellent customer support	Provide feedback, drive product innovation, and contribute to revenue generation
Employees	Fair compensation, safe and inclusive work environment, personal and professional growth, and job security	Affect productivity, innovation, and overall company culture
Suppliers	Long-term business relationships, fair pricing, and ethical sourcing practices	Impact product quality, availability, and overall supply chain sustainability
Shareholders and Investors	Sustainable growth, financial performance, transparency, and strong corporate governance	Provide capital, affect strategic decision-making, and influence corporate reputation
Local Communities	Job opportunities, community development, environmental stewardship, and local economic growth	Affect public perception, grant permits and licenses, and create local partnerships
Industry Partners and Competitors	Collaborative efforts, knowledge sharing, best practices, and industry standards	Drive innovation, shape market dynamics, and impact overall industry trends
Governments and Regulatory Bodies	Legal compliance, responsible business practices, and contribution to national and regional goals	Create and enforce regulations, provide incentives, and impact policy-making
Non-Governmental Organizations (NGOs)	Environmental and social advocacy, responsible business practices, and collaboration on sustainability initiatives	Affect public opinion, provide expertise, and create partnerships for sustainable development
Academia and Research Institutions	Knowledge exchange, research collaboration, and innovation in sustainable practices	Contribute to industry knowledge, drive technological advancements, and support educational programs

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4. Environmental Sustainability

We place a strong emphasis on environmental sustainability. Our innovative solutions are designed not only to optimize energy usage but also to minimize carbon footprints and encourage responsible resource management. This commitment directly contributes to several of the UN SDGs, including:

- **Goal 7: Affordable and Clean Energy:** By optimizing energy usage, we facilitate access to affordable, reliable, sustainable, and modern energy for all, actively contributing to a greener energy future.
- **Goal 9: Industry, Innovation, and Infrastructure:** By propelling industry evolution, driving technological innovation, and pioneering sustainable infrastructure, Fell Tech's innovative solutions directly align with the UN's 9th Sustainable Development Goal, fostering connectivity and resilience in the digital and physical realms.
- **Goal 11: Sustainable Cities and Communities:** Our focus on creating efficient and user-friendly environments aligns with Goal 11. We strive to make buildings inclusive, safe, resilient, and sustainable, improving the quality of life for people in urban and rural areas alike.

At Fell Tech, we recognize the critical importance of environmental sustainability in the development and implementation of our innovative solutions. As a leading technology company, we are dedicated to reducing our environmental impact and promoting responsible resource management across all aspects of our operations. Our commitment to environmental sustainability is demonstrated through our efforts to:

4.1. Energy Efficiency and Conservation

We strive to design and develop products and solutions that minimize energy consumption and promote energy conservation. Our smart energy and home management systems are engineered to optimize energy usage, reducing the environmental footprint of our customers and contributing to a greener future.

4.2. Waste Reduction and Resource Management

Fell Tech is committed to implementing waste reduction strategies and responsible resource management practices throughout our operations. We work to reduce material waste, optimize packaging, and promote recycling and responsible disposal of electronic waste.

4.3. Emissions Reduction

We understand the need to minimize greenhouse gas emissions to mitigate climate change. By offering solutions that encourage energy efficiency and low-carbon technologies, we help our customers reduce their emissions and contribute to global efforts to combat climate change.

4.4. Sustainable Supply Chain Management

Fell Tech is dedicated to ensuring that our supply chain is environmentally sustainable. We work closely with our Suppliers to promote responsible sourcing, reduce the environmental impact of materials and processes, and maintain high standards of environmental stewardship throughout our supply chain.

4.5. Research and Development of Sustainable Technologies

Innovation is at the core of Fell Tech's commitment to environmental sustainability. We continuously

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invest in research and development to create cutting-edge technologies that contribute to a cleaner, greener, and more sustainable future.

4.6. Environmental Compliance and Performance Monitoring

Fell Tech is committed to complying with all applicable environmental laws and regulations. We regularly monitor and evaluate our environmental performance to identify areas for improvement and to ensure that our practices align with our sustainability goals.

4.7. Employee Engagement and Education

We believe that fostering a culture of environmental sustainability begins with our employees. Fell Tech provides training and resources to help employees understand the importance of environmental sustainability and how their actions contribute to our overall sustainability goals.

4.8. Stakeholder Engagement and Collaboration

Fell Tech actively engages with stakeholders, including customers, Suppliers, partners, and local communities, to promote environmental sustainability. We collaborate with industry peers, government agencies, and non-profit organizations to share knowledge, best practices, and innovative solutions for addressing environmental challenges.

By prioritizing environmental sustainability in all aspects of our business, Fell Tech is not only reducing its environmental impact but also empowering our customers, partners, and stakeholders to contribute to global sustainability efforts. We remain dedicated to driving positive change and creating a greener, more sustainable future for all.

5. Social Responsibility

At Fell Tech, we understand that our success is built on the strength of our people. We are committed to fostering a diverse and inclusive work environment, promoting equal opportunity, and investing in the personal and professional growth of our employees. This commitment aligns with the following UN SDGs:

- Goal 5: Gender Equality: We strive to achieve gender equality and empower all women and girls within our organization, ensuring they have equal opportunities and representation at all levels.
- Goal 8: Decent Work and Economic Growth: By providing safe and stable employment opportunities, as well as fostering a healthy work-life balance, we contribute to the UN's goal of promoting inclusive and sustainable economic growth.

We recognize the immense value that our employees bring to our organization. We believe that our commitment to social responsibility is essential for fostering a thriving work environment that supports the well-being, growth, and development of our team members. In line with the UN Sustainable Development Goals (SDGs), we have implemented various initiatives to promote social responsibility within our organization:

5.1. Diversity and Inclusion

We are dedicated to cultivating a diverse and inclusive work culture where employees of all backgrounds, experiences, and perspectives can thrive. We actively work to eliminate discrimination and promote equal opportunities for everyone, regardless of their gender, age, race, ethnicity, religion, sexual orientation, or disability status.

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5.2. Employee Development and Training

Fell Tech is committed to investing in the personal and professional growth of our employees. We offer training and development programs that empower our team members to build their skills, enhance their knowledge, and advance their careers within our organization.

5.3. Health, Safety, and Well-being

We prioritize the health, safety, and well-being of our employees by providing a safe and supportive work environment. Fell Tech implements rigorous health and safety protocols and promotes a healthy work-life balance to ensure the well-being of our team members.

5.4. Community Engagement and Social Impact

Fell Tech is dedicated to making a positive social impact in the communities where we operate. We actively participate in community development projects, support local initiatives, and collaborate with non-profit organizations to contribute to social welfare and sustainable development.

5.5. Ethical Labor Practices

We adhere to the highest standards of ethical labor practices and comply with all applicable labor laws and regulations. Fell Tech is committed to fair and equitable treatment of our employees, including providing competitive compensation, benefits, and opportunities for growth and development.

5.6. Supply Chain Responsibility

Fell Tech recognizes the importance of social responsibility within our supply chain. We work closely with our Suppliers to ensure they adhere to ethical labor practices, promote fair working conditions, and respect human rights.

5.7. Employee Engagement and Feedback

We value the input of our employees and actively encourage open communication and feedback. Fell Tech fosters a culture of continuous improvement, where employees are empowered to share their ideas and contribute to the ongoing development and enhancement of our organization.

By incorporating social responsibility into the core of our company culture, Fell Tech is not only supporting the well-being and growth of our employees but also contributing to the achievement of the UN Sustainable Development Goals. We remain steadfast in our commitment to nurturing a responsible, diverse, and inclusive work environment that promotes the success of our team members and the broader community.

6. Ethical Governance

At Fell Tech, we recognize that ethical governance is the cornerstone of responsible business practices and long-term success. We are dedicated to maintaining the highest standards of integrity, transparency, and accountability in all aspects of our operations, from our internal decision-making processes to our relationships with stakeholders. Our commitment to ethical governance is in line with the United Nations' Sustainable Development Goal (SDG) 16: Peace, Justice, and Strong Institutions.

6.1. Compliance with Laws and Regulations

Fell Tech is committed to operating within the bounds of all applicable laws and regulations in every

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jurisdiction where we conduct business. We continuously monitor and assess our practices to ensure compliance with legal requirements, industry standards, and best practices.

6.2. Code of Conduct and Ethical Guidelines

We have established a comprehensive Code of Conduct that outlines the principles and values that guide our business practices and decision-making processes. This Code serves as a foundation for our ethical governance and sets clear expectations for the behavior and conduct of our employees, suppliers, and partners.

6.3. Anti-Corruption and Bribery Measures

Fell Tech has implemented robust policies and procedures to prevent corruption, bribery, and other unethical practices within our organization. We provide training and resources to educate our employees about the importance of ethical conduct, and we maintain strict reporting mechanisms to ensure that any instances of corruption or unethical behavior are promptly addressed.

6.4. Transparency and Disclosure

We are committed to fostering a culture of transparency and open communication within our organization. Fell Tech regularly discloses information about our business operations, financial performance, and sustainability initiatives to our stakeholders, including shareholders, employees, customers, and regulators.

6.5. Board Oversight and Accountability

Fell Tech's Board of Directors plays a crucial role in overseeing our governance practices and ensuring that we operate with the utmost integrity and accountability. The Board is responsible for setting our strategic direction, monitoring performance, and ensuring that we adhere to our commitment to ethical governance.

6.6. Risk Management and Internal Controls

We have implemented a robust risk management framework that identifies, assesses, and mitigates potential risks to our organization, including financial, operational, and reputational risks. Our internal controls are designed to ensure the accuracy and reliability of our financial reporting, safeguard our assets, and promote compliance with laws and regulations.

6.7. Stakeholder Engagement

Fell Tech actively engages with our stakeholders to understand their perspectives, address their concerns, and integrate their feedback into our decision-making processes. We believe that maintaining open and constructive dialogue with our stakeholders is essential for promoting trust, mutual understanding, and long-term success.

By prioritizing ethical governance, Fell Tech demonstrates our unwavering commitment to conducting our business with integrity, transparency, and accountability. Our dedication to these principles not only fosters a culture of trust and respect within our organization but also contributes to the achievement of the United Nations' Sustainable Development Goals, particularly SDG 16: Peace, Justice, and Strong Institutions.

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7. Collaboration and Partnerships

At Fell Tech, we recognize that achieving a sustainable future requires collective effort and cooperation among various stakeholders. We strongly believe in the power of collaboration to drive meaningful change and foster innovation that benefits society as a whole. Our commitment to forging strong partnerships with our customers, suppliers, local communities, and other stakeholders is in line with the United Nations' Sustainable Development Goal (SDG) 17: Partnerships for the Goals.

7.1. Customer Partnerships

Our customers are at the core of our business, and we are dedicated to understanding their needs and preferences. By collaborating with our customers, we can develop tailored solutions that not only meet their requirements but also contribute to sustainable growth and development. We actively seek feedback from our customers to improve our products and services continuously.

7.2. Supplier Relationships

We understand the importance of maintaining responsible and sustainable supply chain practices. We work closely with our suppliers to ensure that they adhere to our high standards of environmental, social, and ethical responsibility. By fostering strong relationships with our suppliers, we can create a positive impact throughout the entire value chain.

7.3. Community Engagement

Fell Tech is committed to being a responsible corporate citizen and making a positive impact on the communities in which we operate. We engage with local communities to understand their needs and concerns and work collaboratively to address these issues. This includes supporting community-based initiatives, investing in local infrastructure, and promoting educational and development programs.

7.4. Industry Partnerships

We actively collaborate with other industry players to share knowledge, best practices, and technological advancements. These partnerships help drive innovation, improve efficiency, and create new opportunities for growth and development in our sector.

7.5. Public-Private Partnerships

Fell Tech believes in the importance of working together with governments and public institutions to achieve shared sustainability goals. We participate in public-private partnerships to develop and implement innovative solutions to pressing environmental and social challenges, leveraging our expertise and resources to create lasting, positive change.

7.6. Non-Governmental Organizations (NGOs) and Academia

We collaborate with NGOs, academic institutions, and research organizations to deepen our understanding of sustainability issues, develop innovative solutions, and contribute to the broader body of knowledge in our field. These partnerships enable us to stay at the forefront of sustainable practices and drive meaningful change within our industry and beyond.

By prioritizing collaboration and partnerships, Fell Tech demonstrates our commitment to working together with diverse stakeholders to achieve a more sustainable future for all. Our dedication to fostering strong relationships across various sectors supports our efforts to contribute to the United Nations' Sustainable Development Goals, particularly SDG 17: Partnerships for the Goals.

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8. Supplier Sustainability in Electronics Manufacturing and Assembly

Fell Tech recognizes the importance of environmental protection, health and safety throughout our supply chain, particularly in the electronics manufacturing and assembly processes. We are committed to ensuring that our suppliers adhere to the highest standards in these areas and that they comply with all relevant regulations and guidelines.

To achieve this, we require our suppliers to follow the principles outlined below, which are derived from the reference information provided:

8.1. General Environment, Health, and Safety Compliance

Suppliers must implement appropriate measures to protect health, safety, and the environment, both in the workplace and during transportation. They must also establish effective programs to ensure compliance with Section 15 of the Order for any sub-suppliers used in the manufacturing and assembly processes.

8.2. Material Suitability

Suppliers must ensure that all chemical substances in the products they provide are suitable for use and transport in all relevant jurisdictions and comply with the necessary chemical inventory listings, such as TSCA, Federal Hazardous Substances Act, EINECS, ELINCS, and others.

8.3. Material Registration and Documentation

Suppliers must ensure that all chemical substances in their products are properly documented and/or registered as required in all relevant jurisdictions, including compliance with regulations such as REACH. They must also provide supporting documentation, monitor the publication of the REACH Candidate List, and notify Fell Tech of any substances officially proposed for listing.

8.4. Restricted Materials

Suppliers must ensure that their products do not contain any restricted or hazardous materials, such as arsenic, asbestos, benzene, beryllium, carbon tetrachloride, cyanide, lead or lead compounds, cadmium or cadmium compounds, hexavalent chromium, mercury or mercury compounds, trichloroethylene, tetrachloroethylene, methyl chloroform, PCBs, PBBs, PBDEs, and other restricted chemicals or hazardous materials.

8.5. Take-back of Electrical and Electronic Components, Including Batteries or Accumulators

Suppliers must comply with any applicable Take-Back Legislation, such as the WEEE Directive and the Batteries Directive. They must assume responsibility for taking back covered goods and treating or managing them according to the requirements of the applicable legislation.

8.6. CE Directives

Suppliers must ensure that their products conform with applicable CE directives for goods intended for use in the EU. They must also affix the CE mark on goods as required and provide all necessary documentation, including Declarations of Conformity, Declarations of Incorporation, technical files, and any documentation regarding interpretations of limitations or exclusions.

8.7. Nanoscale Material

Suppliers must notify Fell Tech in writing of the presence of any engineered nanoscale material in the products they provide. They must also provide a description of the regulatory status and any safety data

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or other notifications appropriate for the EU, U.S., and any other relevant jurisdictions.

By incorporating these principles into our Supplier Sustainability requirements, Fell Tech aims to create a more sustainable and responsible supply chain, benefiting not only our business but also our customers, employees, and the environment.

9. Life Cycle Assessment and Environmental Product Declaration

At Fell Tech, we're committed to providing environmentally friendly products and services. As part of this pledge, we have fully integrated Life Cycle Assessment (LCA) and Environmental Product Declaration (EPD) processes into our product design and manufacturing stages. This integration is in line with UN SDG 12: Responsible Consumption and Production.

Life Cycle Assessment (LCA)

Understanding the environmental impact of our products throughout their life cycle is essential to us. Our Life Cycle Assessment (LCA) process evaluates the environmental impacts associated with all the life stages of our products. This includes raw material extraction, materials processing, manufacturing, distribution, use, repair, maintenance, disposal, and recycling. By analyzing these stages, we can identify areas where environmental impacts could be reduced.

We've trained our product design team to consider the entire life cycle of the product right from the initial design phase, ensuring that every design choice they make aligns with our environmental commitments. This awareness helps in the creation of more sustainable and efficient products, reducing the overall environmental footprint.

Environmental Product Declaration (EPD)

In an effort to make our sustainability performance transparent and accountable, we've also introduced Environmental Product Declarations (EPDs) for all our products. An EPD is a standardized way of quantifying the environmental impact of a product or system, and it's prepared in accordance with international standards such as ISO 14025 and EN 15804.

These declarations provide detailed information about the product's environmental impact in various categories like global warming potential, ozone depletion potential, acidification potential, and more. Our customers can use these declarations to make more informed decisions about the products they choose.

Moreover, EPDs also facilitate the comparison of the environmental performance of products, encouraging continuous improvement and innovation in our product development process. Our aim is to consistently reduce the environmental impacts of our products, and we're using EPDs as one of the key tools to achieve this goal.

Together, the LCA and EPD form the backbone of our environmental management system, helping us continually enhance our environmental performance and maintain our commitment to sustainability.

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Question or Concern

Subject to local laws and any legal restrictions applicable to such reporting, Fell Tech Stakeholders are invited to inform Fell Tech promptly of any concern related to this Sustainability Strategy affecting Fell Tech, whether or not the concern involves the Stakeholders, as soon as the Stakeholders has knowledge of such an occurrence.

Prompt reporting is crucial — a question or concern may be raised by a Fell Tech Stakeholder as follows:

- By discussing with a Fell Tech Manager; OR
- By calling Fell Tech: **+47 23 96 02 51** OR
- By emailing mail@felltech.no

Note: Stakeholders do not need to be certain that a violation has occurred, but rather should raise a concern when there is a good faith belief that something improper, a violation of law or policy, has occurred.

Fell Tech forbids retaliation against any person reporting a concern.