

Samsung Electronics Nordic AB: Norwegian Transparency Act report 2025

Period: 1 January 2024 - 31 December 2024

Contents

1. Samsung Electronics' business structure and operations.....	2
2. Norwegian Transparency Act.....	2
3. Samsung's labour and human rights salient risks and measures taken	3
a. Samsung's labour and human rights commitment and framework	3
b. Samsung's salient human rights risks	5
c. Human rights and decent working conditions due diligence and measures undertaken in our own entities and subsidiaries.....	9
d. Human rights due diligence and measures undertaken for business relations and suppliers	12
5. Right to information.....	15

1. Samsung Electronics' business structure and operations

Samsung Electronics Co., Ltd. is a South Korean multinational electronics corporation headquartered in Yeongtong-gu, Suwon, South Korea. As of the end of 2024, our global business network consists of more than 240 operational facilities including 33 own production sites, 109 sales offices, 40 R&D centres, and 7 design centres in 76 countries worldwide and a workforce totalling 262,647 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 2024, Samsung reported a turnover of 2,209 billion NOK and invested 269,85 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 Electronics' transaction volume. Samsung Electronics Nordic AB began their operations in 1992 in order to act as a sales and marketing company for the Nordic market. It has 391 employees (2024) 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 2024, 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 due diligence approach can be found in the [global sustainability report](#).

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.

2. Norwegian Transparency Act

The Norwegian Transparency Act (NTA) entered into force on July 1st, 2022. It is intended to strengthen the impact of international guidelines and principles for responsible business, such as the UN's Guiding Principles for Business and Human Rights (UNGPs) as well as the OECD's guidelines for multinational enterprises. The law requires companies falling under a defined threshold in Norway to carry out due diligence assessments including in both their own business and their supply chain, publish an annual report of the due diligence assessments and respond to any reasonable request for access to information on human and labour rights in their own business and one's supply chain. Samsung Electronics Nordic AB is covered by the act.

More information on the Norwegian Transparency Act can be read in the legislation itself [here](#), and on the Norwegian Consumer Authority's [website](#).

Global Key Activities 2024

- Samsung established the Global Grievance Resolution Policy at a global level in April 2024 to ensure grievances are handled in a fair and consistent manner globally, and developed and distributed guidelines for the effective implementation of the policy.
- Samsung appointed dedicated grievance resolution personnel at several sales subsidiaries and research centres and provided training on our grievance resolution policy and guidelines to all grievance resolution personnel worldwide.
- Samsung performed Human Rights Risk Assessments (HRRAs), which focused on determining the severity and likelihood of Samsung's previously identified salient human rights risks across five regions: Europe, the Middle East and Africa, North America, Latin American, and Asia including conducting internal and external stakeholder workshops to discuss the (level of) risks and mitigation strategies.
- Samsung hosts regular human rights workshops. In 2024, Samsung hosted its second human rights stakeholder workshop, bringing together a variety of international human rights organizations and experts to discuss Samsung's salient risks and gather stakeholder feedback to improve Samsung's internal risks management system and mitigation strategies.
- Samsung also hosted its first annual Global Human Rights Workshop for employees, where individuals from different Samsung subsidiaries, including SECA, learned about human rights trends, risks, and efforts across the Samsung group of companies.

In 2024, Samsung achieved a global grievance resolution rate of 98.7% where grievances received through a variety of channels were either closed or remediated by the end of December 2024

3. Samsung's labour and human rights salient risks and measures taken

a. Samsung's labour and human rights commitment and framework

We 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. In line with the UNGPs and OCED guidelines we are committed to prevent, mitigate, and address adverse human rights impacts and to provide timely and effective access to remedy where harm has occurred. This accounts for our own business activities, and we hold our suppliers and other business partners to this same high standard.

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 Labour and 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 in our own operations as well as our supply chain and other business relationships.

Human Rights Governance Structure

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 Labor and Human Rights Council. This structure facilitates the supervision and management of human rights conditions across and at various levels of our business.

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 issues with the relevant leaders in charge of sustainability at Samsung headquarter and at each business unit.

Lastly, the Labor and Human Rights Council is a cross-functional collaborative effort consisting of the People Team, Partner Collaboration Center, Vendor Management Task Force, Global Technology Research, Global EHS Office, Corporate Legal Office, Compliance Team, Investor Relations Team, and Corporate Sustainability Center. The Council discusses and coordinates global labour and human rights issues at our business sites and across our supply chains to address and mitigate potential human rights risks. Agenda items discussed at the Council vary based on materiality and urgency and such items are then escalated to the Sustainability Committee and Sustainability Council. Within the People Team, a designated executive (with company-wide responsibilities for HR, labour relations, and human rights activities at business sites outside of South Korea) also leads the promotion of human rights initiatives across the company. This executive's performance evaluation and incentives are tied to the results of human rights due diligence conducted at business sites.

Each department participating in the Labor and Human Rights Council also actively conducts human rights due diligence to identify, prevent and mitigate human rights impacts that may have caused or contributed by our business operations. The Corporate Sustainability Center manages the overall sustainability agenda of Samsung and handles human rights-related issues by collaborating closely with relevant organizational unites such as the People Team, the Partner Collaboration Center, and Global Technology Research when necessary.

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 labour

in the supply chain. The annual disclosure is also an extension of our efforts to comply with the Norwegian Transparency Act, United Kingdom Modern Slavery Act, and Australian Modern Slavery Act.

Samsung also discloses its official position on human rights issues through the online platform of the Business & Human Rights Resource Centre (BHRRC), a UK based non-profit organization that investigates impacts of business activities on human rights and the environment.

See relevant Code of Conducts, policies, statements and sustainability reports on [Samsung's sustainability website](#).

b. Samsung's salient human rights risks

Identification of Actual and Potential Human Rights Impacts We operate across vast geographies, including in locations where social, economic, and political factors may put human rights and decent working conditions at risk. In line with the UNGPs and OECD guidelines we are committed to prevent, mitigate, and address adverse human rights impacts and to provide timely and effective access to remedy where harm has occurred. This accounts for our own business activities, and we hold our suppliers and other business partners to this same high standard.

Our Labour and Human Rights Framework is based on the aforementioned 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 in our own operations as well as our supply chain and other business relationships.

We identify actual and potential human rights impacts through diverse channels including: labour and human rights risk management system to review the compliance of international labour and human rights standards; internal audits by in-house experts; semi-human rights impact assessment including the engagement with external stakeholders, assessments of specific human rights areas by regional employee relations experts; human rights risk analysis and human rights impact assessments by third-party human rights experts; third-party audits based on RBA (Responsible Business Alliance) protocols; reports of intergovernmental organizations and civil society organizations on geopolitical situation and human rights landscape; media reports; grievances and complaints filed by our employees and other right-holders as well as external stakeholders; and dialogues with human rights experts and external stakeholders including, but not limited to, investors, and industry associations.

In 2023, Samsung hosted our first human rights stakeholder workshop, bringing together the International Labour Organization (ILO) experts, UN human rights experts, global NGOs, and global labour union specialists to discuss our approach to human rights due diligence. In 2024, and to better integrate the expert insights gathered during the event into our processes and ensure compliance with the legal requirements for corporate human rights due diligence being legislated in various countries, we began reviewing and refining our human rights risk management system.

Salient Human Rights Risks

We define our salient human rights risks as those human rights at risk of the most severe negative impacts through our business activities and relationships. We disclosed our salient human rights risks in February 2023 as a part of our [Global Human Rights Principles \(Policy\)](#) identifying 11 salient human rights impacts based on a comprehensive analysis of human rights due diligence results, NGO reports, media articles, stakeholder

dialogues, Samsung Culture Index (organizational culture diagnosis) findings, and employee grievances. Our human rights due diligence is performed with a focus on these salient human rights risks based on priority identified through continuous stakeholder engagement, internal assessments, external audits, grievance channels, and human rights risk and impact assessments. Centred on these risks, we prioritize our efforts and determine activities to prevent, mitigate, and address human rights impacts.

Salient Risks of Adverse Impacts on Fundamental Human Rights and Decent Working Conditions and Related Actions

Salient risks of adverse impacts on fundamental human rights and decent working conditions	Organizational units in charge	Affected stakeholders	Actions to prevent, mitigate, or address risks of adverse impacts
<i>Working hours and adequate standard of living</i>	-People Team -Partner Collaboration Center	- Our employees -Workers in the supply chain	<p>-Internal monitoring and third-party audits -Industry network engagement</p> <p>Working hours -Pre-building of new products prior to their official release -Regular review of working hours at our production sites and suppliers -Diagnosing subsidiaries with irregularities and addressing root causes -Obtaining consent from production line workers for overtime</p> <p>Standard of living -Calculation of living wage based on Anker methodology for 20 production sites -Establishing improvement plans for sites paying below the living wage</p>
<i>Forced labour and child labour</i>	-People Team -Partner Collaboration Centre	-Our employees -Workers in our supply chain	<p>-Internal monitoring, including of government and NGO reports, and third-party audits -Industry network engagement</p> <p>Forced labour -Development of tailored audit tools for our production sites employing foreign migrant workers -On-site audits of our production sites and dormitories -Face-to-face interviews with foreign migrant workers on their working and living conditions -Conducting specialized audits of forced labour for migrant workers employed by our suppliers</p> <p>Child labour-Employment management system -Age verification process -Capacity-building and training -Conducting special audits of child labour for first-tier and second-tier suppliers before and after the school vacation period</p>
<i>Freedom of association and collective bargaining</i>	-People Team -Partner Collaboration Centre -Global Technology Research -Vendor Management Improvement T/F	-Our employees -Workers in the supply chain	<p>-Internal and third-party audits -Reinforcement of relevant articles in our Code of Conduct -Labour and Human Rights Council overseen by the Board of Directors -Capacity-building and training -Dialogues and collaboration with employee representative bodies, including labour unions and works councils</p>
<i>Occupational health and safety</i>	-Global EHS Centre	-Our employees	-Internal and third-party monitoring

	-Partner Collaboration Centre	-Workers in the supply chain	-Acquiring and retaining internationally recognized EHS certifications at all of our business sites -Establishing a monitoring system for all of our global production sites -Development and adoption of new protective gear -Safety capacity-building and training, and fostering experts
<i>Non-discrimination & diversity and inclusion</i>	-People Team -Partner Collaboration Centre	-Our employees -Workers in our supply chain -End users/ Consumers -Local communities/Society	-Internal and third-party audits -Internal DEI network -Capacity-building and training - Annual employee surveys (Samsung Culture Index) -Industry network engagement -Joining the Valuable 500
<i>Anti-harassment</i>	-People Team -Partner Collaboration Centre	-Our employees -Workers in our supply chain	-Internal and third-party audits -Capacity-building and training -Annual employee surveys (Samsung Culture Index)
<i>Product responsibility including AI ethics</i>	-Samsung Research -Corporate Sustainability Centre R&D Teams at each business units	-End users/Consumers	-AI Ethics Principles of fairness, transparency, and accountability -Guidelines on AI Ethics -Provision of AI models and data card templates -Online training
<i>Digital responsibility including privacy and freedom of expression</i>	-Information Security Centre -Global Privacy Office -Communications Team -Partner Collaboration Centre	-Our employees -Workers in our supply chains -End users/Consumers -Local communities/Society	-Provision of products and services in compliance with Samsung Privacy Protection Principles including transparency, security, and choice -Enabling freedom of expression in products and services
<i>Environmental responsibility</i>	-Global EHS Centre -Partner Collaboration Centre -Corporate Sustainability Centre	-Our employees -Workers in our supply chains -End users/Consumers Local communities/Society	-Announcement of the New Environmental Strategy incorporating emissions reduction, new sustainability practices, and innovative technologies and products -Acquiring and retaining internationally recognized environment and energy certifications
<i>Supplier responsibility</i>	-Partner Collaboration Centre -Purchase Teams -Global EHS Centre	-Workers in our supply chains	-Responsible purchasing practice requirements in contracts and evaluations of suppliers -Self-assessments, internal and third-party monitoring -Regular verification of supplier data -Capacity-building and training -Monitoring the status of remedy for victims of human rights violations at first-tier suppliers -Research on using recruitment agencies in sending and receiving countries
<i>Responsible minerals sourcing</i>	-Partner Collaboration Centre -Purchase Teams -Corporate Sustainability Centre	-Workers in our supply chains -Local communities/Society	-Participation in grassroots projects -Capacity-building and training -Industry network engagement -Monitoring data on conflict minerals and high-risk minerals used by first-tier suppliers and smelters -Conducting on-site audits at first-tier suppliers -Requesting a ban on transactions with suppliers using uncertified smelters

c. Human rights and decent working conditions due diligence and measures undertaken in our own entities and subsidiaries

Policies and standards: Samsung adheres to the principles put forward in its own Samsung Global Code of Conduct and Business Conduct Guidelines as well as the [Responsible Business Alliance \(RBA\) code of conduct](#) against which audits in our own factories across the globe are conducted. We are furthermore a signatory of the [UN Global Compact](#), one of the world's largest corporate sustainability initiative, and adhere to its [ten principles](#). We have a range of human rights policies in place, which reflects our top management's commitment to fulfilling our responsibility to respect and support internationally recognized human rights standards and set forward expectations for our own employees and business partners. Apart from topic-specific policies, our Global Human Rights Principles (policy) outlines Samsung's commitment to respect human rights and international standards across its business operations.

Human rights due diligence: In line with the UNGPs and the OCED MNE Guidelines, we work proactively to identify, prevent, and mitigate actual and potential adverse human rights impacts across all aspects of our business operations. Our due diligence includes engagement with various right-holders and stakeholders. We integrate the findings from our due diligence activities in our internal processes to ensure that our policies and management systems remain aligned with the latest internal developments. We monitor the outcomes of the measures taken and report them to our internal and external stakeholders. We adjust the frequency and nature of assessment as deemed necessary based on changing conditions such as entry into new markets, on boarding of new suppliers, and newly identified human rights challenges in certain markets. Our activities include regular self-assessments, audits and topic-specific assessments—such as on responsible migrant worker management—led by internal experts, third-party RBA audits and more in-depth external assessments such as Human Rights Saliency Analysis (HRSA), third-party led human rights impact assessment (HRIA), semi-human rights impact assessments (sHRIAs) by internal experts for high-risk markets as well as topic-focused external assessments such as the effectiveness of our grievance channels.

In 2023, we upgraded the monitoring system we created in 2013 to support labour rights compliance and compliance management at our workplaces to the Business & Human Rights Benchmark (BHRB) System. This system assesses each workplace's compliance with international human rights standards such as the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the UN Guiding Principles on Business and Human Rights (UNGPs). The evaluation indicators consist of 159 detailed indicators in 39 items in four categories: labour rights, organizational culture, working environment, and diversity, equity, and inclusion. Each site is evaluated annually, and consulting and simplified human rights impact assessments are conducted for sites requiring improvement. Additionally, the system allows sites to identify best practices for each indicator, enabling them to autonomously improve their human rights respect activities.

In 2024, Samsung conducted BHRB evaluations for 19 manufacturing sites and issued consulting reports for each site, providing guidance on areas requiring improvement. In 2025, the company plans to further systematize site operations using the BHRB evaluation indicators and support each location in embedding human rights respect into its management practices.

Human rights risk assessments (HRRAs): In 2024, Human Rights Risk Assessments (HRRAs) were carried out in five regions across the globe. These include Europe, the Middle East and Africa, North America, Latin America, and Asia. Samsung's HRAA process includes:

- Taking steps to assess salient human rights risk by site per region and considering the seriousness of the risk and the occurrence likelihood.
- Generating regional human rights risk heat map based on the assessment results to distinguish the level of risk.
- Operating regional workshops to discuss the human rights risk heat map, and the appropriateness among regional subsidiaries.
- Communicating with external stakeholders to discuss and finalize a regional human rights risk heat map with such external stakeholders.

Samsung has assessed the seriousness of each salient human rights risk by determining the level of negative impact on an individual or their community, the number of people addicted, and the possibility of resolving the negative impact. We have additionally reviewed the likelihood of each salient human rights risk by identifying areas of operation and specific business models that may pose greater risks, and evaluating the human rights management capacity and level of interest of business partners. To further determine likelihood, we reviewed the environmental aspects of the region where the business operates (e.g., war, armed conflict, weak rule of law, or lack of effective legislation), and assessed whether risk prevention and mitigation measures are implemented.

In 2024, we also conducted audits to identify risk factors related to labour-management relations at our manufacturing sites. Seven manufacturing sites with a history of related grievances were selected for review. The audits focused on more than 100 checkpoints, including external factors such as inflation rates in the host country and wage levels at neighbouring companies, as well as HR systems, grievance channels and employee representative bodies, communication with field managers and site heads, and the capabilities of labour-management relations personnel.

Access to remedy: Samsung is committed to providing access to remedy to affected individuals or groups via our grievance channels where the company causes or contributes to negative impacts on the rights of individuals or groups. In April 2024, Samsung established and published the [Global Grievance Resolution Policy](#). Following this, we developed guidelines to ensure the policy's effective implementation and distributed them to all subsidiaries worldwide. Furthermore, in January 2025, Samsung appointed dedicated grievance resolution personnel at several sales subsidiaries and research centres lacking clear grievance channels and governance systems. Samsung also provided training on our grievance resolution policy and guidelines to all grievance resolution personnel worldwide, including those newly appointed. This training aimed to ensure that our grievance mechanism operates in line with the effectiveness criteria for non-judicial grievance mechanisms outlined in the UN Guiding Principles on Business and Human Rights.

Samsung has strengthened its commitment to provide access to remedy, provides guiding principles of how to handle grievance channels and remediation processes and provides an overview of its channels and grievance handling procedure. Samsung offers a variety of grievance channels for individuals or groups that are adversely affected by our business operations (e.g., Samsung Electronics' Global Business Ethics & Compliance system). A complainant may report a grievance anonymously or choose to be identified. We are committed to upholding the confidentiality of the grievance and protecting the complainant in all cases. At the same time, we do not tolerate retaliation against the complainant in response to filing a grievance. Reported grievances are assigned to different organizational unit(s) based on the nature of the grievance and, if necessary, several organization units work together toward effective remedies.

While grievances are generally processed in the order of when they are received, higher-priority complaints are dealt with in an urgent manner due to their severity in line with the UNGPs rationale, considering that delayed responses could lead to irremediable harm. The grievance procedure consists of four steps – receipt,

investigation, notification, and resolution – and the goal is to handle and close grievances within three months. However, depending on the characteristics of the grievances such as where the grievance involves external stakeholders or possible violation of the law, the procedure may take more than three months and there may be changes to the procedure. Insights into aggregated grievance data and concrete cases, remedy provided and actions taken to prevent reoccurrence are provided [in Samsung's global sustainability report](#).

Samsung also promotes external stakeholders' grievance communication channels. Samsung operates a global communication address (sustainability.sec@samsung.com), to listen to the opinions of various external stakeholders. Samsung continually evaluates the effectiveness of our internal and external grievance procedures and seek to improve accessibility and system design where necessary.

Samsung Nordic has implemented a local Whistleblowing system, which was updated in adherence with the [Global Grievance Resolution Policy](#) in 2025, to secure compliance with laws in this area across Europe and Nordic. This system includes a third-party portal where employees can file reports, and local whistleblowing policies for Sweden, Finland, Norway, and Denmark. The reason for implementing separate, local policies in the countries, is that local laws on whistleblowing differ per country. In addition to the Whistleblowing policies, Samsung Nordic has also a local Equality & diversity policy, and Code of Conduct that includes sections on respectful and equal treatment of employees.

Employees can also raise complaints and concerns in the workplace with their manager or a Head of Division or the HR or Legal teams – the whistleblowing system exists, on top of that.

In 2024, one grievance was reported to Samsung Nordic. The matter was investigated according to policies and our grievance processes in place, and communicated to parties involved. No grievances regarding human rights were reported.

Stakeholder engagement: Stakeholder engagement is one of the core pillars of Samsung's Labour and Human Rights Framework and an important element of our human rights' due diligence process. As part of our ongoing efforts to uphold human rights, 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 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 2024, Samsung hosted its second human rights stakeholder workshop, bringing together a variety of international human rights organizations and experts to discuss Samsung's salient risks and gather stakeholder feedback to improve Samsung's internal risks management system and mitigation strategies.

Training and development: To help our employees understand their rights and train managers and relevant departments on the implementation of human rights into business practices and everyday activities, Samsung conducts every year a range of different labour and human rights trainings tailored to different target groups. Every year, we focus on global workplaces in the DX sector, such as production subsidiaries, sales and research

institutes, and conduct human rights education for employees. Human rights training for employees assigned to human rights duties was first introduced in 2021 for staff in Human Resource, General Affairs, and Purchasing. Since then, it has become a regular annual program for Purchasing Managers and employees worldwide. This program covers the definition of business practices that respect human rights, international human rights standards, the importance of human rights in business activities, human rights issues within Samsung Electronics, and the role of Purchasing employees. In 2024, 95.7% of our employees completed the Global Human Rights training, with the completion rate for online and offline training at 93.4% and 98.8%, respectively.

Moreover, aligning with international expectations to strengthen human rights due diligence in the downstream supply chain, we offer training for due diligence managers at our overseas production and sale sites and research centres as a part of our Global Human Rights Risk Assessment. Building on the training provided in 2023 for due diligence staff from five EU sales subsidiaries, we expanded the program in 2024 to include due diligence managers. The training covered various topics such as the concept of human rights, international human rights standards, and legislative efforts related to corporate responsibility for human rights across various countries.

Human rights training for human rights champions has been conducted since 2020 with the goal of integrating human rights into each subsidiary's business activities. About 60 human rights champions from global sites also serve as human rights trainers in their respective subsidiaries in the field of HR, labour relations, compliance, and training. They identify potential human rights risks that may arise in their business sites, interact with other human rights champions from other subsidiaries, and advise each other on their activities. In 2024, they received advanced training from global human rights experts invited from outside the company. The training covered various topics such as legislative efforts related to corporate responsibility for human rights across various countries, Samsung Electronics' latest Grievance policy, freedom of association, and the right to collective bargaining.

In 2024, Samsung also hosted its first annual Global Human Rights Workshop for employees, where individuals from a variety of Samsung subsidiaries attended a virtual workshop to learn about human rights efforts across the Samsung group. The workshop focused on Human Rights trends and developments on a global scale, Samsung's salient human rights risks assessments, and key focus areas for supply chain due diligence to be addressed through 2024. Some localized efforts were showcased by Samsung Germany, Samsung Türkiye-Production, and Samsung Latin America.

Further information on Samsung's human rights work in its own operations including figures on actual adverse impact can be found in the global [sustainability report](#) in the sections "Our People" as well as on [Samsung's sustainability website](#).

In the Nordics, we conduct internal training sessions at Samsung Nordic and have established comprehensive guidelines and policies that all employees must adhere to, ensuring the prevention of discrimination or harassment incidents in the workplace.

d. Human rights due diligence and measures undertaken for business relations and suppliers

Policies and standards: Complementing Samsung's Global Human Rights Principles (policy) and other human rights related policies, Samsung requests its suppliers to adopt our Supplier Code of Conduct and Guidelines, which is based on international human rights principles and which set of social, environmental and ethical industry standards. As a signatory of the UN Global Compact, one of the world's largest corporate sustainability initiative, we adhere to its ten principles as well as to the [Responsible Business Alliance \(RBA\) code of conduct](#)

against which audits in our supply chain across the globe are conducted. Our Global Purchasing Code of Conduct comprises the key requirements from the regulations and guidelines on purchase-related tasks and ethical obligations of employees in charge of purchasing. Samsung Electronics' Responsible Minerals Report sets expectations for its supplier and their subcontractors on responsible minerals management.

Human rights due diligence: Samsung closely cooperates with its suppliers and other business partners to address, prevent and mitigate the risk of adverse impacts on fundamental human rights and decent working conditions as well as to provide and support the facilitation of access to remedy where harm has occurred. Samsung promotes long-term business partnerships based on the concept of continuous improvement, addressing human rights risks in collaboration with its partners. Responsible disengagement is part of human rights due diligence efforts where corrective actions and improvements are not possible.

Third-party audit: Samsung conducts 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. In 2024, Samsung conducted third-party audits for 90 first-tier suppliers and 33 second-tier suppliers. A total of 1,914 workers participated in employee interviews. To enhance transparency and encourage workers to express their opinions freely, off-site interviews were introduced for select suppliers starting in 2024. These off-site interviews were conducted with 29 workers from nine first-tier suppliers and 3 workers from two second-tier suppliers in countries such as South Korea, Vietnam, and Mexico.

First-tier suppliers:

- Samsung screens and selects new suppliers based on a set of evaluation criteria that include labour and human rights considerations. On-site audits are conducted for potential suppliers based on RBA criteria. In 2022, Samsung has complemented this process with additional surveys and interviews of prospective suppliers on the three essential items of forced labour, inhumane treatment, and discrimination to better protect the rights of workers from socially vulnerable groups. Once selected, new suppliers' contract clauses mandate compliance with internationally accepted labour and human rights standards.
- All supplier-related matters are handled through Samsung's integrated purchase system based on the Global Purchasing Code of Conduct and the Supplier Code of Conduct, operated by an organizational unit dedicated to comprehensive supply chain management. As part of our due diligence process, we operate an integrated work environment management process consisting of regular self-assessments, on-site audits, and third-party audits with a priority given to suppliers identified as high-risk. More targeted activities complement those efforts, such as special audits on forced labour to detect more severe violations as well as the development of a self-diagnosis tool to support suppliers in their responsible recruitment journey. As part of its efforts to prevent the employment of child laborer's, Samsung conducts special inspections at the recruitment sites of our first-tier and second-tier suppliers every year during the middle and high school vacations when child laborers are likely to be recruited. Samsung requires improvement measures for violations detected in assessments and audits and monitors their implementation status.

Lower tier suppliers: Suppliers from the second tier and below are currently managed through first-tier suppliers in Samsung's supply chains in compliance with our internal work environment policy. However, understanding the importance of better oversight, Samsung started to conduct Third-Party Audits on nine second-tier suppliers in Asia in 2023, including major production subsidiaries in Vietnam. As stated above, we expanded the scope to include 33 second-tier suppliers. For subcontractors with issues deemed to be of serious concern, we monitor

via our first-tier suppliers whether remedial actions have been successfully implemented. Near our Suwon business site in Korea, Samsung offers capacity building programs which are free of charge to our tier 1 as well as tier 2 suppliers which cover topics including supply chain due diligence.

Responsible minerals management: Samsung identifies and remediates risk factors in relation to all of its mass-produced materials suppliers based on the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Samsung conducts inspections on the status of responsible minerals used, utilizing relevant industry reporting templates such as from the RBA's Responsible Minerals Initiative (RMI) and by conducting audits based on Samsung Electronics Responsible Minerals Report. Samsung only uses minerals from smelters certified by global, independent third-party organizations and requires its suppliers to extend the ban on conflict minerals to their subcontractors in accordance with Samsung's conflict minerals policy. Further information can be found in [Samsung Electronics' Responsible Minerals Report](#).

Access to remedy: Samsung expects of its suppliers to provide access to remedy to rightsholders where harm has occurred via its [Supplier Code of Conduct](#) and its Global [Grievance Resolution Policy](#). Samsung supports its suppliers in establishing and operating an internal grievance handling system to facilitate communication between the executive management and employees. We have operated a direct hotline since 2013 to collect reports on violations of the work environment criteria or human rights by our suppliers via telephone and email, among others, to complement on-site audits. We ensure the protection of informants' privacy throughout the entire grievance process so that employees at our suppliers can submit reports without fearing retaliation. Our organizational unit dedicated to grievance handling handles grievances in line with our internal protocol and timeline and monitors respective suppliers to ensure that they take remedial actions. Training and other measures are taken with the respective suppliers to support the prevention of reoccurrence. An informant satisfaction survey, operated since 2020, supports effective case handling and the integration of workers voices into the process. Insights into aggregated grievance data and concrete cases, remedy provided and actions taken to prevent reoccurrence are provided in [Samsung's sustainability report](#).

Stakeholder engagement: In support of our human rights 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).

Training and development: Since 2015, Samsung has hosted a range of compliance and human rights workshops and training sessions for the heads and working-level staff of our suppliers on a yearly basis, ranging from legal requirements, audit results and best practices of our suppliers as well as corporate culture to specific human rights and environmental topics outlined in the Supplier Code. To mitigate forced labour risks among suppliers employing migrant workers, Samsung has put in place the Responsible Recruitment Procedure training course to improve our suppliers' understanding relevant procedures and to help eliminate risks. Since 2023, Samsung put forward ESG trainings, prioritizing to build suppliers' capacities in sustainability management in areas including climate action, resource circularity, human rights, compliance, and social responsibility.

Further information on Samsung's human rights supply chain management including figures can be found in the global [sustainability report](#) in the sections "Sustainability in supply chain".

4. Right to information

Under 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 labour rights risks in its own business and business operations globally. 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.

Ji Hoon (Jason) Kim
President
Samsung Electronics Nordic AB
2025-06-24

Samsung Electronics Nordic AB

Signature Certificate

Document name:

Samsung Norwegian Transparency Act Report 2025

Unique document ID:

acb85bff-f04e-4331-9d57-7d80c492ea85

Document fingerprint:

**7d8087f752f0207dc740e08a4be18ef200ee265ddd5b9bae98f7cab803da6a40a5db183052ec362d
50af5063e96ec8ee3e6813ee78e031b7f644134163ac90a6**

Signatories



Ji Hoon Kim

President and CEO

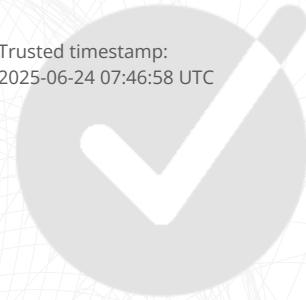
Samsung Electronics Nordic AB

Email: jason1.kim@samsung.com

Device: Samsung Browser 28.0 on K Android 10
(smartphone)

IP number: 212.16.188.231

Trusted timestamp:
2025-06-24 07:46:58 UTC



This document was completed by all parties on:

2025-06-24 07:46:58 UTC

Accepted consent

Samsung Electronics Nordic AB will process your personal data in connection with the signing of this document as a data controller. Please note that Samsung will NOT send you any marketing communication as a result of your given consent below. For more information regarding Samsung's processing of your personal data in connection with signing this document, please see the privacy policy available in English at <https://www.samsung.com/se/info/privacy/e-signature>.



This document is signed using GetAccept Digital Signature Technology.
This Signature Certificate provides all signatures connected to this document and the audit log.

Audit log

Trusted timestamp

2025-06-24 07:46:58 UTC

Event with collected audit data

Document was signed by Ji Hoon Kim (jason1.kim@samsung.com)
Device: Samsung Browser 28.0 on K Android 10 (smartphone)
IP number: 212.16.188.231

2025-06-24 07:46:54 UTC

Document was opened by Ji Hoon Kim (jason1.kim@samsung.com)
Device: Samsung Browser 28.0 on K Android 10 (smartphone)
IP number: 212.16.188.231

2025-06-24 07:46:54 UTC

Document was verified via consent by Ji Hoon Kim (jason1.kim@samsung.com)
Device: Samsung Browser 28.0 on K Android 10 (smartphone)
IP number: 212.16.188.231

2025-06-24 07:18:47 UTC

Document was sent to Ji Hoon Kim (jason1.kim@samsung.com)
Device: Firefox 119.0 on Unknown Windows 10.0 (computer)
IP number: 212.16.188.245

2025-06-24 07:18:45 UTC

Document was sealed by Irina Tetenkina (i.tetenkina@samsung.com)
Device: Firefox 119.0 on Unknown Windows 10.0 (computer)
IP number: 212.16.188.245

2025-06-24 07:17:55 UTC

Document was created by Irina Tetenkina (i.tetenkina@samsung.com)
Device: Firefox 119.0 on Unknown Windows 10.0 (computer)
IP number: 212.16.188.245



This document is signed using GetAccept Digital Signature Technology.
This Signature Certificate provides all signatures connected to this document and the audit log.