

About Comrod

Comrod Communication is a multinational group of companies, headquartered in Tau, Norway, with subsidiaries in France, Sweden, Hungary and the United States. Comrod is a world leader in the design and manufacture of antennas, antenna systems, tactical masts, and power supplies for the military and commercial markets. Comrod's product portfolio consists of sectional and telescopic masts, manpack/vehicle/remote antennas, power supplies and battery chargers.

Mitigating human right's risk in the supply chain

Comrod Communication AS and subsidiaries (hereinafter referred to as "Comrod") is, as emphasized in our Code of Conduct and underlying procedures, committed to comply with all applicable laws and regulations. Comrod opposes modern slavery and any form of human right's violations, including indecent working conditions associated with Comrod's supply chains, as also enshrined in Comrod's Code of Conduct.

Comrod is subject to the Transparency Act. The Act shall promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure the general public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions. The Act builds on international procedure and consensus about the requirements for responsible business conduct as well as Norwegian traditions of transparency and access to information.

The Act sets out obligations for companies to conduct due diligence of its supply chain (Nw: *Aktsomhetsvurderinger*). The due diligence shall be risk based and proportionate and should focus on key risk factors in the supply chain with an emphasis on the severity and probability of any adverse impact on human rights. The ability to identify high-risk suppliers and to adopt adequate risk mitigation measures is key.

The vast majority of Comrod's critical suppliers are located in Europe. However, Comrod is mindful that some of these suppliers have a supply chain that entails an inherent risk for human rights violation.

Comrod has implemented various compliance measures to prevent and detect supply chain risks, including adverse impact on human rights and working conditions.

Firstly, social sustainability and the respect for human rights is anchored at the top of Comrod's organisation and at the Board level. Further, Comrod has implemented various procedures to mitigate adverse human rights' impact in the supply chain. Comrod's procedure on onboarding of suppliers sets out compliance check requirements before entering into agreements with vendors. The procedure prescribes a methodology to identify suppliers that pose an inherent compliance risk. Comrod has also adopted a set of risk mitigating measures, such as conducting integrity due diligence/background checks and audits of high-risk suppliers and obtaining supplier declarations.

Should Comrod identify human rights violation in its supply chain, Comrod will instigate remedial actions, such as establishing a dialogue with the relevant supplier to obtain risk relevant information and to understand how the supplier intends to remediate the adverse impact on human rights. If the remedial actions are not assessed to be adequate and proportionate, Comrod will enforce contract clauses that entitle Comrod to suspend or terminate the supplier agreement.

Comrod has also prepared a guidance and procedure document in relation to the Transparency Act that shall enable the procurement team in Norway to act in compliance with the Act and to respond to any requests for information.