

Transparency Statement 2024

Tibber's efforts towards transparent and responsible supply chains

Overview of Tibbers business

Tibber is a digital energy company that empowers households to lower their electricity consumption and costs through smart, technology-driven solutions. To support this mission, Tibber offers electricity contracts, automated energy management services, a mobile app with real-time consumption insights, and an online store featuring home energy management products. Tibber operates in four markets, Norway, Sweden, Germany, and the Netherlands.

Tibber is structured as a matrix organization. The Group headquarters is located in Førde, Norway, but the company also has offices in Oslo, Stockholm, Berlin, Amsterdam, and Helsinki. The Group consists of a parent company and seven wholly-owned subsidiaries:

Parent company:

- Tibber AS

Subsidiaries:

- Tibber Norge AS
- Tibber AB
- Tibber Norge Strøm AS
- Tibber Oy
- Tibber Deutschland GmbH
- Tibber Netherlands B.V.
- Tibber Denmark A/S

While Tibber sells various third-party products in the Tibber Store, Tibber Pulse is designed in-house. Its production is managed by a Norwegian supplier based in Horten, with manufacturing taking place in Poland and China.

Process to enhance responsibility and transparency

Tibber is a member of the UN Global Compact and reports annually on the ten principles. The company has incorporated the United Nations Guiding Principles for Human Rights into its internal code of conduct and its supplier code of conduct.

Tibber's processes and routines to enhance responsible supply chain management align with the OECD guidelines and are approved by the board and top management. This includes

Tibber's supplier code of conduct that is aligned with the OECDs guidelines and reviewed by EY and Factlines.

Factlines is a software provider Tibber collaborates with to conduct supplier due diligence in accordance with the Norwegian Transparency Act. A risk assessment is conducted via a questionnaire sent to Tibbers suppliers.

External reports identify a material risk associated with sourcing certain minerals commonly used in electronic devices, especially tantalum, tin, tungsten, and gold, collectively known as 3TG or "conflict minerals". Therefore, Tibber prioritizes efforts towards hardware suppliers for the Tibber Store.

If a Tibber supplier is categorized as "high risk", initiatives such as additional documentation or audits will be undertaken to further investigate the situation. In the event of actual breaches, Tibber will take action to mitigate the consequences and prevent further incidents.

With the Norwegian Transparency Act that came into effect in 2022, Tibber has also established routines to manage incoming requests. Questions can be directed to sustainability@tibber.com, and incidents can be reported through Tibber's whistleblowing mechanism found at <https://app.falcony.io/tibber-wb/links/whistleblowing>.

2024 due diligence results

Tibbers Supplier Code of Conduct has been signed by major partners and suppliers.

In 2024, all suppliers delivering products or related installation services to the Tibber Store, with a purchase volume exceeding 500,000 NOK (2023: 1 million NOK), were asked to conduct a risk assessment covering human rights, working conditions, corruption, supply chain practices, governance, and environmental impact.

As of December 31, 2024, Tibber has not identified any human rights violations or concrete breaches. Out of the 28 suppliers with an annual procurement volume above NOK 500,000, 26 responded to our human rights due diligence screening. Two suppliers have not yet replied despite follow-up attempts. We will continue our efforts to engage with them.

21 suppliers were assessed as "low risk", while five suppliers were assessed as "medium risk" (2023: nine suppliers identified as "low risk", one assessed as "medium risk"). Those suppliers assessed as "medium risk" included small and medium-sized electronic retailers and installation companies with less than 50 employees, headquartered in Europe. Due to partially lacking definition and implementation of a social and environmental responsibility strategy and management systems, they were classified by Factlines as "medium risk".

Efforts to mitigate risk of human right violations

At this stage, we do not consider these medium-risk findings to represent immediate or significant human rights concerns. The assessed risks primarily relate to areas where formal policies and management systems are under development or in the early stages of implementation. Nonetheless, we view these findings as areas for ongoing monitoring and engagement.

In 2025, we are working to strengthen our follow-up procedures with suppliers and will engage in dialogue to identify and address areas for improvement. Where needed, we will explore joint measures to reduce risks. We plan to further expand the scope of our human rights due diligence by lowering the procurement threshold for supplier screening from NOK 500,000 to NOK 250,000, allowing for a more comprehensive assessment of potential risks across our supply chain. Moreover, we will continue to enhance our procedures to fully integrate risk assessments into the onboarding process for new suppliers.

These initiatives help us better understand the risk in Tibbers supply chains, communicate our standards towards our suppliers and partners and will over time enhance both transparency and responsibility.

We will publish our next due diligence report by 30 June 2026.

Board signatures

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