



Transparency Statement 2023

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Tibber's efforts towards transparent and responsible supply chains.

Overview of Tibber's business

Tibber exists to empower customers to use energy more intelligently and sustainably. The company offers electricity contracts, an energy app and an online store for smart home equipment. 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 by Tibber. The production of Tibber Pulse is made by a Norwegian supplier in Horten, Norway, with production in Polen 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.

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.

Tibber collaborates with a platform; Factlines, to conduct supplier due diligence. A risk assessment is conducted via a questionnaire sent to Tibber's suppliers, measured by expenditure.

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>.

2023 due diligence results

In the spring of 2023, suppliers delivering products to the Tibber Store with expenditures above 1 million NOK were asked to conduct a risk assessment covering the topics of human rights, working conditions, corruption, supply chain, governance, and environment.

As of December 31, 2023, Tibber has not identified any human rights violations or concrete breaches. Nine suppliers were assessed as “low risk,” while one supplier was assessed as “medium risk.

Tibber’s Supplier Code of Conduct has been signed by major partners and suppliers.

Efforts to mitigate risk of human right violations

Tibber is expanding the scope of our due diligence process every year. While the scope was defined by a spend limit of 1 mill NOK in 2023, the limit is 500 NOK in 2024. In 2024, risk assessment is also being implemented as part of onboarding of new suppliers.

Tibber’s supplier code of conduct is aligned with the OECDs guidelines and reviewed by EY and Factlines. It is included in all new supplier contracts to ensure compliance with human rights and good working conditions.

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

Board signatures